ENVIRONMENTAL ASSESSMENT

for construction of the proposed LaGrange Primary-Oseligee Creek 230kV Transmission Line and Oseligee Creek 230/25kV Substation

Troup County, Georgia



Rural Development | Rural Utilities Service Environmental and Historic Preservation Division

prepared by:

Georgia Transmission Corporation 1979 Lakeside Parkway Tucker, GA 30084

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List of Acronyms

- ACSR Aluminum Conductor Steel Reinforced
- APC Alabama Power Company
- APE Area of Potential Effect
- APLIC Avian Power Line Interaction Committee
- **BMP** Best Management Practice
- CFR Code of Federal Regulations
- CWA Clean Water Act
- DOI Department of Interior
- DOT Department of Transportation
- EA Environmental Assessment
- EPA United States Environmental Protection Agency
- EPD Environmental Protection Division of Georgia Department of Natural Resources
- EIS Environmental Impact Statement
- EMC Electric Membership Corporation
- EMF Electromagnetic Field
- EPRI Electric Power Research Institute
- E&SC Erosion and Sedimentation Control
- ESA Endangered Species Act
- FAA Federal Aviation Administration
- FEMA Federal Emergency Management Agency
- FIRM Flood Insurance Rate Map
- FONSI Finding of No Significant Impact
- FSA Farm Service Agency
- GA Georgia
- GADNR Georgia Department of Natural Resources
- GDOT Georgia Department of Transportation
- GIS Geographic Information Systems
- GNHP Georgia Natural Heritage Program
- GPC Georgia Power Company
- GRP Grassland Reserve Program
- GTC Georgia Transmission Corporation
- HPD Historic Preservation Division of Georgia Department of Natural Resources
- IPaC Information for Planning and Consultation
- ITS Georgia Integrated Transmission System

- MEAG Municipal Electric Authority of Georgia
- MRLC Multi-Resolution Land Cover Characteristic Consortium
- NEPA National Environmental Policy Act
- NERC North America Electric Reliability Corporation
- NHPA National Historic Preservation Act
- NLCD National Land Cover Database
- NPDES National Pollutant Discharge Elimination System
- NPS National Park Service
- NRCS Natural Resource Conservation Service
- NRHP National Register of Historic Places
- NWI National Wetland Inventory
- NWP Nationwide Permit
- NWR National Wildlife Refuge
- O.C.G.A. Official Code of Georgia
- PCM Protection, Control, and Monitoring System
- RD Rural Development
- **RUS Rural Utilities Service**
- ROW Right-of-way
- S/S Substation
- SAS Southeastern Archeological Services, Inc.
- SBAA
- SHPO State Historic Preservation Office (aka Historic Preservation Division)
- SPCC Spill Prevention, Control, and Countermeasure
- T/L -Transmission Line
- THPO Tribal Historic Preservation Officer
- US United States
- USACE United States Army Corps of Engineers
- USC United States Code
- USDA United States Department of Agriculture
- **USFS United States Forest Service**
- USFWS United States Fish and Wildlife Service
- USGS United States Geological Survey
- WRD Wildlife Resources Division of Georgia Department of Natural Resources

1. INTRODUCTION

Georgia Transmission Corporation (Georgia Transmission), a not-for-profit electrical cooperative based in Tucker, Georgia, plans to seek financial assistance from the U.S. Department of Agriculture (USDA), Rural Utilities Service (RUS), under its electric program for constructing the proposed Oseligee Creek 230/25 kilovolt (kV) Substation and the associated LaGrange Primary - Oseligee Creek 230kV Transmission Line in Troup County, Georgia (collectively, the proposed project). These proposed facilities are needed to implement the preferred corrective action plan (Proposed Action) identified in the *2021 West Georgia Transmission Expansion Study Report*, particularly portions of the action plan assigned to Georgia Transmission. The product of collaborative analyses and screens, the preferred corrective action plan will be sponsored jointly by members of the Southern Company (Alabama Power Company and Georgia Power Company) and Georgia Transmission to address thermal limitations contingent on the loss of certain 500kV and 230kV circuits in the northwest region of the Georgia Integrated Transmission System¹ (ITS) as identified in the aforementioned bulk planning study.

Because Georgia Transmission plans to apply for project financing assistance from RUS, the proposal constitutes a federal action subject to review in accordance with Rural Development's (RD) Environmental Policy and Procedures for implementing the National Environmental Policy Act (7 CFR Part 1970). RUS has determined that the proposed action requires the preparation of an Environmental Assessment (EA) due to the action not qualifying as a Categorical Exclusion, as listed in 7 CFR 1970 Subpart B. This EA identifies and evaluates the significance of environmental impacts associated with the proposed construction, maintenance, and operation of the proposed transmission projects associated with the proposed Oseligee Creek 230/25 kilovolt (kV) Substation and the associated LaGrange Primary - Oseligee Creek 230kV Transmission Line Project. The EA will demonstrate the Agency's compliance with the requirements of the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C] §§ 4321-4347) and USDA Rural Development regulations (Title 7 CFR 1970). RUS is the lead federal agency for the Project as defined by 40 CFR 1501.7(2024). As the lead federal agency, RUS must evaluate the Project's effect on historic properties under Section 106 of the National Historic Preservation Act (42 U.S.C. §§ 4321-4347) and its implementing regulation "Protection of Historic Properties" (36 CFR 800). Pursuant to 36 CFR 800.2(d)(3), RUS is using its procedures for public involvement under NEPA, in part, to meet its responsibilities to solicit and consider the views of the public during Section 106 review. This EA will address laws, regulations, executive orders, and guidelines promulgated to protect and enhance environmental quality, including the Endangered Species Act, the National Historic Preservation Act, the Farmland Protection Policy Act, the Clean Water Act, and executive orders governing floodplain management and wetland protection.

This Environmental Assessment is being prepared during a National Energy Emergency as per Executive Order 14156 signed on January 20, 2025.

¹ The ITS is a vast and and unique network of transmission lines covering 90% of the state that allows for the efficient flow of power. Ownership in the ITS is shared between the Municipal Electric Authority of Georgia, Dalton Utilities, Georgia Power, and GTC. Individual transmission lines and substations are owned and maintained by the individual ITS owner, but they are planned and operated as one system.

2. PURPOSE AND NEED

USDA, RUS:

The Rural Electrification Act of 1936, as amended (7 U.S.C. §§ 901-950cc-2), authorizes and empowers the Secretary of Agriculture to make loans to nonprofit cooperatives and others for rural electrification for the purpose of financing the construction and operation of generating plants, electric transmission and distribution lines, or systems for the furnishing and improving of electric service to persons in rural areas (7 USC § 904). A primary function or mission of RUS is to carry out the electric loan program (7 USC § 6942).

RUS does not regulate the siting of generation and transmission infrastructure. The federal action related to the proposed project will be RUS's granting of financial assistance for construction of the proposed Oseligee Creek 230/25kV Substation and the associated LaGrange Primary - Oseligee Creek 230kV Transmission Line. RUS's decision regarding whether to grant the requested financing assistance will be made based on the environmental analysis outlined in the EA and subsequent engineering and financial reviews. Issuance of this EA is not a decision on a loan application and, therefore, not an approval of the expenditure of federal funds.

Issuance of the EA and any subsequent environmental findings is required in accordance with NEPA and RD's Environmental Policies and Procedures (7 CFR Part 1970). Legal challenges to the EA and any subsequent environmental findings may be filed in federal district court under the Administrative Procedure Act.

Georgia Transmission:

Georgia Transmission is an electric transmission cooperative established under the laws of the State of Georgia in 1996. As a member of the ITS, the corporation helps plan, build, and maintain the infrastructure (high voltage transmission lines and substations) comprising the Georgia energy grid, thus, helping local communities have access to reliable and affordable energy. Current assets include more than 780 substations as well as more than 5,000 miles of transmission lines. With help from electric distribution (lower voltage) cooperatives, like Diverse Power that serves parts of Troup County, Georgia Transmission is able to provide power to more than 4.5 million Georgians.

To minimize outages and maintain the flow of reliable power, Georgia Transmission studies grid activity and uses this data to forecast future usages as well as future conditions that may compromise the integrity of the Georgia energy grid. For this Proposed Action, the electrical justification is as follows: With the increasing penetration of renewable resources within the Southern Balancing Authority Area (SBAA), power flow patterns continue to change to account for the increased output from these resources and their displacement of traditional fossil fueled plant output. Updated planning models (2021 series, version 2) have included these current generation assumptions which have significant reduction in coal-fired plant output consistent with current resource plans. Analysis of these models identified thermal limitations in the northwest region of the Georgia ITS for the loss of certain 500kV and 230kV transmission circuits that are detailed below. In these scenarios, if an existing line is not in operation then limitations are observed on other existing transmission lines that could lead to cascading overloading conditions. The proposed project is needed to resolve these reliability issues and to maintain the flow of reliable power. Below is a summary of the electrical contingencies or observed potential scenarios that limit operations and jeopardize grid stability:

<u>2024</u>

- Loss of the Heard County Tenaska 500kV line results in thermal constraints on the Fortson – LaGrange Primary 230kV line
- Loss of the Fortson Tenaska 500kV line results in thermal constraints on the Fortson – LaGrange Primary 230kV line

<u>2026</u>

• Loss of the Fortson – LaGrange Primary 230kV line results in thermal constraints on the Kia Motors – Pittman Road 115kV line

<u>2027</u>

• Loss of the Pittman Road – West Point Primary (APC) 115kV line results in thermal constraints on the Pittman Road – West Point Dam (USA) 115kV line

<u>2028</u>

 Loss of the Fortson – LaGrange Primary 230kV line results in the thermal constraints on the Kia Motors – LaGrange #11 115kV line

<u>2029</u>

- Loss of the Fortson Tenaska 500kV line results in thermal constraints on the Dyer Road – East Roanoke (APC) 115kV line
- Loss of the Heard County Tenaska 500kV line results in thermal constraints on the Dyer Road – East Roanoke (APC) 115kV line

3. PROJECT DESCRIPTION

The Georgia ITS is proposing to insert additional capacity into the transmission system by constructing three new electrical transmission facilities and by modifying existing assets, as necessary, to support the new facilities (**Figure 1.0, Appendix 9.1**). With financial assistance from RUS, Georgia Transmission will construct two of the new facilities, the LaGrange Primary – Oseligee Creek 230kV Transmission Line as well as the Oseligee Creek 230/25kV Substation. These two initiatives are considered federal actions subject to RUS' Environmental Policies and Procedures and together comprise the Proposed Project. The remaining portions of the preferred corrective action plan, namely the 230kV transmission line constructed in State of Alabama, and existing assets modified within the State of Georgia will be designed, modified, and financed by other electric utilities. This portion of the area plan, assigned to APC and GPC, while considered a connected action is not a federal action, and as such, are listed and described below but are not carried through for further review in this EA.

3.1 Projects Assigned to Georgia Transmission (Proposed Project)

- 3.1.1 LaGrange Primary Oseligee Creek 230kV Transmission Line Construction
 - Georgia Transmission will construct a 16.5 mile, 230kV transmission line consisting of approximately 115 single-pole and 10 three-pole structures. The single-pole structures, composed of spun concrete or steel, will have a vertical configuration when collocating with roads and a delta configuration when cross-country, i.e., not roadside. The ten three-pole structures, composed of spun concrete, all have horizontal configurations. The average span between poles is approximately 700 feet; however, spans range from 70 feet to nearly 1400 feet. Similar to spans, there is some variation in pole heights. Pole heights range from 95 to 120 feet above grade and is highly dependent on topography and the presence or absence of attachments to poles, such as distribution underbuild.

Georgia Transmission will acquire approximately 183 acres of easement from public and private landowners on which to locate the line. The width of the transmission line right-of-way (ROW) will vary in size, from 25-30-feet when collocating with public roads to 100-feet in width elsewhere. Regardless of width, approximately 115 acres of transmission line easement have woody vegetation and will be cleared ground-to-sky to establish in perpetuity an area of low growing vegetation utilizing mechanized equipment and/or low ground pressure and hand clearing techniques.

In addition to the above, Georgia Transmission will acquire 2.0 miles of ROW easement to ensure adequate access to each structure associated with the project. Most of the easements, which are approximately 30 feet in width, are existing paths that need minor improvements, such as blading or smoothing of the ground surface and side-trimming of encroaching vegetation.

3.1.2 Oseligee Creek 230/25kV Substation Construction

Geogia Transmission will construct a new 230/25kV, 25 mega volt-amperes (MVA) substation with metering near the Georgia – Alabama state line for terminating both APC and Georgia Transmission circuits. The circuits are associated with the LaGrange Primary-Oseligee Creek 230kV Line to be built in Georgia and the Oseligee Creek-Opelika 230kV Line that will be built in Alabama. This station will also have room for a 4-bay low-side for a local electric cooperative, Diverse Power. Approximately 6.0 acres of land disturbance (clearing, mass grading and excavating, etc.) is required to provide for a level substation pad, access drives, parking, and drainage controls. Georgia Transmission has purchased from GPC approximately 11.5 acres of private property to site the substation.

3.1.3 Diverse Power 25kV Low-Side Construction

This portion of the project involves the construction of a 4-bay low-side within the fenced yard of the proposed Oseligee Creek Substation as well as the installation of four overhead exit feeders that will connect the new substation to Diverse Powers' existing distribution network. This work, undertaken by the member-owned cooperative, will occur entirely within the limits of the proposed substation property or existing distribution ROW.

3.2 Projects Assigned to Southern Company (Connected Actions)

3.2.1 LaGrange Primary Substation Modification

LaGrange Primary: GPC will perform all the work necessary to facilitate the new line termination at the existing LaGrange Primary 230/115/46kV Substation, per Transmission Improvement Notification (TIN) #102-22BP. All work will take place within the existing fenced substation yard.

3.2.2 Oseligee Creek – North Opelika 230kV Transmission Line Construction

Oseligee Creek – North Opelika: a new, 15-mile line from Oseligee Creek (Georgia) to North Opelika (Alabama). APC will design, construct, and finance this portion of the preferred corrective action plan.

4. PROJECT ALTERNATIVES

4.1 Electrical Alternatives

Several electrical alternatives were considered to respond to the system reliability issues identified in Section 3.0. Six electrical alternatives, including a "no action" alternative, are outlined below.

4.1.1 No Action Alternative

With this alternative, there are no environmental consequences as the Georgia ITS would not address the electrical reliability issues identified in Section 3. In addition, as generation at Franklin is dispatched at full output based on expected transmission service requests (TSRs), more thermal constraints will appear in the area. Per TPL-001-4, these thermal constraints must have a corrective action plan.

- 4.1.2 <u>Preferred Corrective Action Plan / Proposed Action:</u> New LaGrange Primary – North Opelika 230kV Line (\$64 M)
 - GTC Construct approximately 15-mile 230 kV (100° 1351 ACSR conductor) from LaGrange Primary to the GA/AL state line. Utilize existing 115 kV corridors as needed. (\$30M)
 - ITS Construct a new metering station at the GA/AL line and terminate GTC and APC circuits. (\$2M)
 - GPC Modify Lagrange Primary Substation to terminate new 230 kV circuit to North Opelika. (\$2M)
 - APC to construct an additional 15 miles within Alabama to the N. Opelika substation. (~ \$30M)

4.1.3 Brute Force (\$105 M)

- Dyer Road East Roanoke (APC) 115 kV
 - o 2029 Op Guide: Open Breakers 416880 and 416990 at Dyer Road
- Fortson Lagrange Primary 230 kV
 - 2024 Rebuild 37.5 miles with 125° C 1351 ACSR
- Kia Motors Lagrange 11 115 kV
 - o 2028 Rebuild 10.6 miles with 100° C 1033 ACSR
- Kia Motors Pittman Road 115 kV
 - o 2026 Rebuild 4.6 miles with 100° C 1033 ACSR
- Pittman Road West Point Dam (USA) 115 kV
 - 2027 Rebuild 3.2 miles with 100° C 795 ACSR
- 4.1.4 Butler Thomaston 230kV (\$80 M)
 - Convert Butler-Thomaston 115kV to 230kV using 100°C 1351 ACSR.
 - Convert Butler 115KV bus, Wesley 115KV bus to 230KV bus
 - Replace Butler 115/46 kV transformer with 230/46 kV transformer

- 4.1.5 Fortson Thomaston 230 kV (\$150M)
 - New 51-mile Fortson Thomaston 230 kV line constructed along existing 115 kV ROW using 100° C 1351 ACSR conductor.
- 4.1.6 <u>Snowdoun Wansley 500 kV (\$360 M)</u>
 - New 120-mile Snowdoun Wansley 500 kV line constructed using 3-100° C 1113ACSR conductor.
- 4.1.7 Electrical Alternative Selection

After careful evaluation, other electrical alternatives besides the preferred alternative were discounted due to a combination of factors: Either these alternatives were less cost effective, did not fully address thermal limitations, and/or required significantly longer project lead times when compared to the preferred corrective action plan. For more information relating to the technical justification for the proposed project, please see **Appendix 9.2**.

4.2 Oseligee Creek Substation: Physical Site Alternatives

Members of the Georgia ITS and APC determined that construction of a substation with metering would be most desirable near the border of Georgia and Alabama as the station would serve as the terminus for both Georgia Transmission and APC circuits. Four potential sites located due north of the city of West Point and to the west of the Chattahoochee River were identified (**Figure 2.0, Appendix 9.1**) and information to assist in their vetting was collected from existing databases, research, and field reconnaissance gathered from public rights-of-way. The merits of each site are discussed in the following subsection and are also available in **Table 1.0** on page 12.

4.2.1 Alternative Site A

Site A is located approximately 300 feet from the state line and is to the west of the main thoroughfare, South State Line Road. This alternative involves the purchase of a 3.4 acre site that is partially wooded. It is also partially a cleared and graded yard that appears to be an extension of the parking area associated with the industrial complex located due south. Site A has the following additional characteristics:

- 300 feet from the Georgia and Alabama state line
- No mapped wetlands, floodplains, or streams onsite
- Good access from South State Line Road; however, with slightly reduced line-of-sight as located along a curve in the road
- Relatively flat as previously cleared and graded
- Possibly interferes with current operations or future expansion of industrial complex
- Requires slightly longer GTC transmission line or circuits relative to other alternatives
- Site is relatively small for a 230kV substation with metering

4.2.2 <u>Alternative Site B</u>

Site B is located approximately 800 feet from the state line and is to the east of the main thoroughfare, South State Line Road. This alternative involves the purchase of an 11.3 acre site that is all wooded except for an existing, cleared distribution easement in the middle of the site. Site B has the following additional characteristics:

- 800 feet from the Georgia and Alabama state line
- Mapped floodplains present, but site large enough to develop without impacting environmental features
- Good access from South State Line Road
- Relatively flat near road frontage with steep slopes when approaching Chattahoochee River
- Does not interfere with existing development as already owned by another electric utility
- Requires slightly shorter GTC transmission line or circuits relative to other alternatives
- Developable portion of site large enough for a substation with metering

4.2.3 Alternative Site C

Site C is located approximately 700 feet from the state line and is to the east of the main thoroughfare, South State Line Road. This alternative involves the purchase of a 4.2 acre site that is all wooded. Site C has the following additional characteristics:

- 700 feet from the Georgia and Alabama state line
- No mapped wetlands, floodplains, or streams onsite; however, mapped floodplains are immediately adjacent
- Good access from South State Line Road
- Moderately sloping topography
- Possibly interferes with future development plans of City of West Point per elected official meetings
- Requires slightly shorter GTC transmission line or circuits relative to other alternatives
- Developable portion of site large enough for a 230kV substation with metering

4.2.4 Alternative Site D

Site D is located immediately adjacent to the state line and is to the west of the main thoroughfare, South State Line Road. This alternative involves the purchase of a 5.0 acre site that is mostly wooded. The site, however, is also partially fenced and developed along its road frontage as it also appears to be associated with the industrial complex located on the same tax parcel. Site D has the following additional characteristics:

- Closest alternative to the Georgia and Alabama state line
- Mapped wetlands and floodplains present
- Good access from South State Line Road
- Steep slopes and moderately eroded soils associated with the majority of site that is not immediately adjacent to the road
- Site possibly interferes with current operations or future expansion of industrial complex
- Requires slightly longer GTC transmission line or circuits relative to other alternatives
- Given presence of mapped wetlands and floodplains, developable portion of site is relatively small for 230kV substation with metering

4.2.5 Preferred Substation Site

The four sites possessed many of the same characteristics and all except for the smallest were deemed suitable for constructing and operating the proposed metering station. However, the team's analysis of the project requirements resulted in an overall ranking of the alternative sites and in an identification of a preferred site (**Figure 3.0, Appendix 9.1**). The preferred site, Site B, is reasonably close to the Georgia and Alabama state line, it is large enough to accommodate a metering station without impacting environmentally sensitive areas and does not require any conversion of land use. It is already intended to be used as a utility property as it is owned by GPC. For the above reasons, a slightly modified version of Site B was selected as the preferred site.

4.3 Transmission Line: Physical Route Alternatives

Georgia Transmission evaluated corridors between the two project endpoints, the existing LaGrange Primary 230/115/46/12kV Substation and the proposed Oseligee Creek 230/25kV Substation, in Troup County, Georgia. Land cover and land use, topography, existing and proposed developments, transportation and utility corridors, parks, existing environmental conditions (mapped streams, wetlands, and floodplains), and the project's electrical requirements were considered during routing. Georgia Transmission and contractually related consultants performed research, data collection, analysis, mapping, and statistical evaluations to determine the most suitable corridor for the proposed transmission line.

Georgia Transmission uses geographic information system (GIS) software and a standardized methodology that was developed in partnership with the Electric Power Research Institute (EPRI) for transmission line routing studies. Land suitability analysis, using this software, began once all related data within the project study area was acquired and entered into the GIS database. The methodology utilizes a geographic feature layering system that creates a map of suitability areas in a continuum from most preferable areas to least preferable areas for transmission line construction. The geographic database contains layers such as hydrography, land use, land cover, slope, potential habitat for threatened and endangered species, historic and archaeological resources, and other buildings within the study area.

To create overall suitability values, data layers are given weights, and features within each layer are given numerical preference values ranging from 1 to 9. Areas of higher preference for transmission lines are assigned lower numbers than less preferable areas. Weights and values are standardized for all new transmission line routing projects. The weights and values were assigned by stakeholders during workshops held in 2003 and recalibrated ten years later by a similar set of stakeholders in 2013. The stakeholders included members of the Georgia electrical utility industry, government agencies, and non-government organizations. In the latter set of workshops, stakeholders were divided into four groups based on their expertise: the built environment (focusing on community issues), the natural environment, including environmental regulatory issues, the engineering environment (focusing on access, steep slopes, and other engineering constraints), and the collocation environment (focusing on colocation with existing linear infrastructure, i.e., roads, power lines, pipelines, etc.). Map layers are also divided into each of these perspectives: built environment, natural environment, collocation, and engineering concerns. The stakeholders' values are applied to the layers and to each feature in the layers. The values developed by the stakeholders are then used to generate suitability maps for each perspective. Each pixel of the suitability map is the weighted sum of each layers' values.

Four suitability maps are created by placing an emphasis on the data layers of one of the four perspectives. A fifth suitability map is generated by considering each perspective equally. In turn, an alternate corridor is generated from each suitability map. The corridors are produced by applying an algorithm that assigns a preference value to all areas in the study area while also considering connectivity between the two project end points. This allows diverse alternatives to be generated that consider all features utilized in the siting model. The top 3% of possible preferred areas are used to define the corridors, which are the areas that balances impacts to communities and the natural environment, co-locates with existing linear infrastructure, and is best suited for the construction of a transmission line. The corridors were identified and used as a guide to develop suitable alternate routes for the proposed transmission line project. Approximately 32 route segments and 74 routes were developed and later analyzed. The alternatives that the Route Selection Team determined to be the most suitable—Route T, Route AP, Route BP and Route BV—are illustrated in Figures 4.0-4.4. The merits of each route are discussed in the following subsection and are also available in Table 2.0 on page 12.

4.3.1 <u>Route T</u>

Route T originates at the existing Lagrange Primary 230/115/46/12kV Substation located in the City of LaGrange along Colquitt Road. The route then proceeds as a rebuild in a southerly direction utilizing existing transmission line ROW, wherever feasible, for one and one-half miles. As a rebuild, the proposed route crosses over Edgewood Avenue and Hamilton Road as well as briefly collocates with Gunn Street, Lukken Industrial Drive East, and Fort Drive. After Fort Drive, the first mile of new transmission line begins, and the proposed route while angling to the southwest begins to parallel existing transmission lines for several miles through an industrial section of town until reaching Old Hutchinson Mill Road.

From here for approximately two miles, the proposed route collocates with Old Hutchinson Mill Road and afterwards parallels the northside of I-85. Upon crossing an existing transmission line, the proposed route angles to the west and briefly collocates with the existing utility corridor. Next it angles to the southwest and parallels Cannonville Road, Robert Taylor Road and an active railroad labeled as Seaboard Coastline Railroad on maps until angling to the west for approximately 4.25 miles and reaching West Point Road/US Highway 29. From this point, the route collocates with West Point Road/US Highway 29 for nearly 1.75 miles in a southerly direction and later Jackson Road for an additional mile in a westerly direction. Jackson Road ends, but the line continues west, crossing the Chattahoochee River. Shortly after crossing the river, Route T terminates at the proposed Oseligee Creek 230/25kV Substation located in the City of West Point along South State Line Road.

Route T as proposed is approximately 15.8 miles in length. This alternative includes approximately 1.37 miles of line rebuild, 5.53 miles of alignment that collocates with existing road corridors and 3.70 miles that collocates with existing transmission lines. Route T has the following additional characteristics:

- 0 homes within easement / home relocations
- 86 homes within close proximity
- 128 tax parcels crossed
- 80 acres of natural forest clearing required

- 24 USGS blue line stream crossings
- 16 acres of wetlands within easement
- 28 acres of 100-year floodplain within easement
- 19 historic resources are within 1500 feet
- Closest proximity (across the road) to West Point Lake Park
- 0 miles within West Point River Part Trails, a local park
- 67% collocation with other linear facilities

4.3.2 Route AP

For a description of the first few miles, see the first paragraph under Route T as these alternatives are similar for their initial 4.5 miles and only differ upon reaching Old Hutchinson Mill Road. From here for approximately two miles, the proposed route collocates with Old Hutchinson Mill Road and afterwards parallels the northside of I-85. Upon crossing an existing transmission line, the proposed route angles to the west and briefly collocates with the existing utility corridor. Next it angles to the southwest and parallels Cannonville Road, Robert Taylor Road, and an active railroad labeled as Seaboard Coastline Railroad on maps for approximately 5.5 miles. From this point, the route collocates with Webb Road for 0.25 mile in a westerly direction, West Point Road/US Highway 29 for nearly 0.25 mile in a southerly direction, and later Jackson Road for an additional mile in a westerly direction. Jackson Road ends, but the line continues west, crossing the Chattahoochee River. Route T, shortly after crossing the river, terminates at the planned Oseligee Creek 230/25kV Substation located in the City of West Point along South State Line Road.

Route AP as proposed is approximately 15.64 miles in length. This alternative includes approximately 1.37 miles of line rebuild, 4.21 miles of alignment that collocates with existing road corridors, 3.70 mile that collocates with existing transmission lines, and 5.18 miles of new cross-country alignment. Route T has the following additional characteristics:

- 0 homes within easement / home relocations
- 82 homes within close proximity
- 122 tax parcels crossed
- 84 acres of natural forest clearing required
- 23 USGS blue line stream crossings.
- 22 acres of wetland within easement
- 34 acres of 100-year floodplain within easement
- 17 historic resources are within 1500 feet
- Adjacent (600-feet) to West Point Lake, a federal park
- 0 miles within West Point River Part Trails, a local park
- 63% collocation with other linear facilities

4.3.3 Route BP

For a description of the first few miles, see the first paragraph under Route T as these alternatives are similar for their initial 4.5 miles and only differs upon reaching Old Hutchinson Mill Road. From here the route crosses over Old Hutchinson Mill Road and Interstate 85 and begins to parallel the southside of I-85 until reaching and briefly collocating with Kia Boulevard. From Kia Boulevard Road, the proposed route parallels existing transmission lines—first in a southerly approach until reaching Kia Parkway, then in an easterly direction until crossing West Point Road/US Highway 29, and lastly in a

northerly direction until crossing the Chattahoochee River. The proposed route then terminates at the planned Oseligee Creek 230/25kV Substation located in the City of West Point along South State Line Road.

Route BV as proposed is approximately 16.66 miles in length. This alternative includes approximately 1.99 miles of line rebuild, 1.50 miles of alignment that collocates with existing road corridors, 13.19 miles that collocates with existing transmission lines, and 5.18 miles of new cross-country alignment. Route BP has the following additional characteristics:

- 2 homes within easement / home relocations
- 85 homes within close proximity
- 128 tax parcels are crossed by easement
- 23 historic resources are within 1500 feet
- 74 acres of natural forest clearing required
- 26 USGS blue line stream crossings.
- 14 acres of wetlands within easement
- 37 acres of 100-year floodplain within easement
- Furthest from West Point Lake, a federal park
- 1.4 miles within West Point River Part Trails, a local park
- 100% collocation with other linear facilities

4.3.4 Route BV

For a description of the first few miles, see the first paragraph under Route T as these alternatives are similar for their initial 4.5 miles and only differs upon reaching Old Hutchinson Mill Road. From here, the proposed route collocates with Old Hutchinson Mill Road and afterwards parallels the northside of I-85 until reaching and briefly collocating with Sandtown Road. From Sandtown Road, the proposed route parallels existing transmission lines—first in a southerly approach until reaching Kia Parkway, then in an easterly direction until crossing West Point Road/US Highway 29, and lastly in a northerly direction until crossing the Chattahoochee River. The proposed route then terminates at the planned Oseligee Creek 230/25kV Substation located in the city of West Point along South State Line Road.

Route BV as proposed is approximately 16.66 miles in length. This alternative includes approximately 1.99 miles of line rebuild, 1.50 miles of alignment that collocates with existing road corridors, 13.19 miles that collocates with existing transmission lines, and 5.18 miles of new cross-country alignment. Route BP has the following additional characteristics:

- 0 homes within easement / home relocations
- 56 homes within close proximity
- 94 tax parcels are crossed by easement
- 24 historic resources are within 1500 feet
- 77 acres of natural forest clearing required
- 23 USGS blue line stream crossings.
- 16 acres of wetlands within easement
- 38 acres of floodplain within easement
- Furthest from West Point Lake, a federal park
- 0 miles within West Point River Part Trails, a local park
- 78% collocation with other linear facilities

TABLE 1.0: Metrics and General Suitability for Alternate Substation Sites

	Site A	Site B	Site C	Site D
Wetlands	No	No No		Yes
Floodplains	No	Yes	No	Yes
Streams	No	No	No	No
Industrial Expansion	Less Compatible	Compatible Compatible		Less Compatible
City of West Point - Walking Trail	Compatible	Compatible	Less Compatible	Compatible
Existing Utilities	No	Yes	No	Yes
Access	Good / Poor Sight Lines	Good / Safe	Good / Safe	Good / Safe
Acreage Suitability	No - Too Small	Yes	No - Too Small	Yes

Higher Suitability

Lower Suitability

TABLE 2.0: Metrics and General Suitability for Alternate Transmission Line Routes

	Route T	Route AP	Route BV	Route BP
Home Relocations	0	0	2	0
Homes Within 300-Feet (#)	86	82	85	56
Parcels Crossed by Easement (#)	128	122	128	94
Historic Resources APE (#)	19	17	23	24
Natural Forest (acres)	80	84	74	77
Stream Crossings (#)	24	23	26	23
Wetlands (acres)	16	22	14	16
Floodplains (acres)	28	34	37	38
Collocation (%)	67	63	100	78
West Point Lake (Federal Park)	Adjacent	Adjacent	Adjacent	Adjacent
West Point River Park Trail (Local Park)	No	No	Yes	Yes

Higher Suitability

Lower Suitability

4.3.1 <u>Preferred Transmission Line Route</u>

Many of the alternatives, including the top four alternative routes, were considered reasonable routes for constructing the proposed LaGrange Primary – Oseligee Creek 230kV Transmission Line. However, analysis and input by a Route Selection Team resulted in an overall ranking of routes and in the identification of a preferred route. After reviewing data assembled on the alternate routes and assessing the impacts associated with each, it was the consensus of the Route Selection Team that Route BV represented the preferred route (**Figure 5.0, Appendix 9.1**).

The preferred route best balances the engineering requirements of the proposed project with impacts to residential communities and to the natural environment. The preferred route achieves this balance largely by collocating with established transmission line corridors through industrial sectors and not as much with local roads. Alternatives that collocate with local roads have great access but also have a larger impact on residences in a community: For instance, routes that parallel roads tend to cross more parcels and are in close proximity to more occupied homes, both historic and non-historic. As such, fewer parcels and occupied homes in general are associated with the preferred route. In addition, the preferred route is located largely within industrial complexes as it parallels existing corridors, reducing impacts to residential communities in the LaGrange and West Point area. Furthermore, by paralleling existing power lines, the preferred route can capitalize on existing water crossings and not require as many new installations or improvements. In summary, the preferred route has been accepted by the Site Review Board composed of managerial and executive staff at Georgia Transmission as it is engineeringly sound as well as takes into account existing environmental conditions, existing corridors, existing land use, and costs in terms of construction, operation and maintenance.

5. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The proposed project is located within unincorporated Troup County, Georgia as well as within several smaller municipalities, namely the cities of LaGrange and West Point. In terms of quadrangles, the proposed project may be found on the LaGrange, Georgia; Cannonville, Georgia; and Lanett North, Alabama; United States Geological Survey (USGS) 7.5-minute series topographic maps (Figures 6.0, Appendix 9.1). In terms of physiographic regions, the project falls within the Southern Piedmont Section of the Piedmont Province, specifically the Greenville Slope District that is characterized by rolling topography that decreases from 1000 feet in the northeast to 600 feet in the southwest (Clark & Zisa, 1976). Elevation along the proposed project which is located in the southwestern portion of the district, ranges from approximately 740 feet in the north near the city of Lagrange to approximately 600 feet in the south. According to Physiographic Map of Georgia (1976), all streams in the district flow to the Gulf of Mexico and those in the western portion of the district where the project is located occupy shallow, open valleys with broad, rounded divides. The southern boundary of the Grenville Slope District follows the northern base of Pine Mountain range, where elevation rises abruptly 250 to 400 feet above adjacent surfaces.

5.1 Land Use / Important Farmland / Formally Classified Lands

5.1.1 Important Farmland Soils

5.1.1.1 Affected Environment

Through the passage of the Farmland Protection Policy Act of 1981 and the Final Rule for its implementation, 7 CFR §658, the USDA mandated that any Federal agency contemplating a land disturbing activity should review its actions with respect to prime, unique, statewide or locally important farmland soils. The location and extent of the soils are important as they help identify areas that are best suited for food, feed, fiber, forage, and oilseed crops. The Natural Resources Conservation Service's (NRCS) policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978 (Web Soil Survey).

Digital copies of the NRCS Soil Surveys were reviewed for the location of important farmland soils along both components of the proposed project **(Figure 7.0, Appendix 9.1)**. According to the web soil survey, nineteen (19) soil mapping units are associated with the transmission line portion of the project and an additional three (3) soil mapping units are associated with the substation site.

Not all of the soil mapping units are classified as prime farmland or as farmland of statewide importance. As detailed in **Table 3.0**, 8 of the 19 soil mapping units associated with the transmission line are classified as important farmland soils. Similarly for the substation, only 2 of the 3 soil mapping units associated with the transmission line are classified as important farmland soil. Please see **Table 4.0** for a list of soil mapping units associated with the proposed substation with metering.

5.1.1.2 Environmental Consequences

As detailed in Section 5.1.6, the proposed project is underlain by several soil mapping units classified as prime farmland soils or as farmland of statewide importance. These important farmland soils account for approximately 37% (69 acres) of the transmission line; and for approximately 53% (6.2 acres) of the substation site. Utilizing data derived from the NRCS, there is approximately 317,440 acres of prime, unique, statewide or locally important farmland soils within Troup County. Given that the proposed project is underlain only 75.2 acres (by less than 1%), projected impacts to important farmland soils are minimal. Furthermore, the NRCS has determined that the utilization of prime farmland soils for transmission line easements does not necessarily result in their conversion to nonagricultural use. Many crops and agricultural activities can remain within the transmission line corridor. Also. agricultural activities may be performed on acres surrounding the project as adjacent lands are not affected by the undertaking. Please see Appendix 9.3 for the impact rating for the site component of the proposed project according to the USDA, NRCS Form AD-1006. A form has not been completed for the transmission line rebuild as RUS does not require such documentation for utility lines.

5.1.1.3 <u>Mitigation</u>

No mitigation is required.

Map Unit Symbol	Map Unit Name	Rating	Acres AOI	Percent of AOI
AmB	Appling sandy loam, 2 to 6 percent slopes	All areas are prime farmland	5.6	3.0%
AmC	Appling sandy loam, 6 to 10 percent slopes	Farmland of statewide importance	5.2	2.8%
CeB	Cecil sandy loam, 2 to 6 percent slopes	All areas are prime farmland	6.0	3.3%
CeC	Cecil sandy loam, 6 to 10 percent slopes	Farmland of statewide importance	10.9	6.0%
CeD	Cecil sandy loam, 10 to 15 percent slopes	Not prime farmland	23.9	13.0%
CfC2	Cecil sandy clay loam, 6 to 10 percent slopes, eroded	Not prime farmland	31.5	17.1%
CfD2	Cecil sandy clay loam, 10 to 15 percent slopes, moderately eroded	Not prime farmland	20.0	10.9%
CuC	Cecil-Urban land complex, 2 to 10 percent slopes	Not prime farmland	7.5	4.1%
DgB	Davidson loam, 2 to 6 percent slopes	All areas are prime farmland	11.0	6.0%
GwC2	Gwinnett sandy clay loam, 6 to 10 percent slopes, eroded	Not prime farmland	11.9	6.5%
GwD2	Gwinnett sandy clay loam, 10 to 15 percent slopes, eroded	Not prime farmland	4.4	2.4%
MfD2	Madison gravelly sandy clay loam, 10 to 15 percent slopes, eroded	Not prime farmland	1.2	0.7%
PgD2	Pacolet sandy clay loam, 10 to 15 percent slopes, moderately eroded	Not prime farmland	8.6	4.7%
PhE3	Pacolet-Udorthents complex, gullied	Not prime farmland	0.0	0.0%
Rh	Riverview loam	All areas are prime farmland	4.3	2.3%
RK	Riverview-Chewacla association	Farmland of statewide importance	25.3	13.8%
W	Water	Not prime farmland	1.6	0.9%
WhC	Wickham fine sandy loam, 6 to 10 percent slopes	All areas are prime farmland	0.5	0.3%
WvC	Wilkes gravelly sandy loam, 4 to 10 percent slopes	Not prime farmland	4.0	2.2%
Totals for A	Area of Interest (AOI)		183.7	100.0%

TABLE 3.0: Soil Mapping Units for Transmission Line

TABLE 4.0: Soil Mapping Units for Metering Station

Map Unit Symbol	Map Unit Name	Rating	Acres AOI	Percent of AOI
CeC	Cecil sandy loam, 6 to 10 percent slopes	Farmland of statewide importance	4.7	40.10%
CeD	Cecil sandy loam, 10 to 15 percent slopes	Not prime farmland	5.6	47.40%
Rh	Riverview loam	1.5	12.50%	
Totals for Are	11.8	100.00%		

5.1.2 Formally Classified Lands

There are specific land areas that have been afforded special protection through formal legislative designations and are either administrated by federal, state, or local agencies, tribes, or private parties. These properties have been termed "formally classified lands". It is important that these areas be identified in early project planning and design so that any special use permits or other access issues can be considered during the assessment of environmental impacts. Formally classified lands may include but are not limited to the following: National Parks and Monuments, National Forests and Grasslands; National Historic Landmarks; National Battlefield and Military Parks; National Historic Sites and Historical Parks; National Natural Landmarks; National Wildlife Refuges; National seashores, lake shores, and trails; Wilderness areas; Wild , scenic, and recreational rivers; state parks; state fish and wildlife management areas; Bureau of Land Management administered lands; and Native American owned lands and leases administered by the Bureau of Indian Affairs.

5.1.2.1 <u>Affected Environment</u>

There are no formally classified lands associated with the proposed site for the substation with metering. However, along or adjacent to the proposed transmission line, there are federal and locally administered properties that may be considered "formally classified lands". Please see **Figure 8.0** in **Appendix 9.1**.

West Point Lake

Administered by the US Army Corps of Engineers (USACE), West Point Lake is a man-made reservoir formed in 1969 by the impoundment of the Chattahoochee River by the West Point Dam. Seen as engineering marvels, the dam and lake serve as guardians to communities along the Chattahoochee River as the dam regulates water flows and protects against widespread flooding. The dam and the lake are also authorized under the 1962 Flood Control Act to provide hydroelectric power as well as other functions that include navigation, fish and wildlife development, and general recreation.

According to the USACE (2025), the area administered by them is expansive as the lake, extending 35 miles along the Chattahoochee River, is surrounded by deep forests and rolling fields. While portions of the property remain undisturbed and forested, other areas of the property are heavily utilized by the public for recreation. There are, for instance, 36 parks, 2 marinas, and 7 campgrounds. Given its location and extensive size, several of the alternative routes evaluated would possibly require easement along the forested fringes of property associated with West Point Lake. Georgia Transmission contacted USACE, and all of the alternatives requiring easement along West Point Lake were deemed inconsistent with USACE plans. Consequently, the proposed project was not sited along any part of the West Point Lake and is only adjacent to or rather in close proximity with, approximately 0.5 miles south of the dam and lake.

West Point River Park Trails

Founded in 2023, West Point River Trails is a relatively new local park that is owned and administered by the city of West Point. The park is

bounded by the Chattahoochee River to the west and by US Highway 29, local roads, and residential developments on all remaining lands except to the north where the bordering property remains undeveloped. Allowing for undisturbed open space and passive leisure activities, West Point River Trails has a restrictive covenant that only allows for passive recreation—walking, hiking, bicycling, horseback riding, picnicking, and the like versus active recreational activities like tennis courts, baseball fields, swimming pools, gymnasiums, or similar facilities.

Georgia Transmission is proposing to locate approximately 1.4 of the 16.5 miles of the proposed transmission line within this local passive park. The proposed project is located along the northern extents of the property as it roughly mimics the property's northern limits. This portion of the local park affected by the proposed project already contains another high voltage transmission line.

5.1.2.2 Environmental Consequence

West Point Lake

The proposed project does not physically cross the lake nor does it cross its surrounding property. The proposed project, however, may be described as being adjacent to, or rather in close proximity with West Point Lake as the project is approximately 0.5 miles south of the dam and lake. As adjacent lands are not affected (i.e., converted into utility easements), no effects to West Point Lake are reasonably anticipated.

West Point River Park Trails

The proposed project minimizes the amount of ROW required by paralleling and partially sharing easement with another high voltage transmission line that is already within the passive park. Many of the trails are actually located within the easement of the existing high voltage line, apparently taking advantage of the cleared, maintained nature of transmission line rights-of-way. The proposed project widens the existing corridor by approximately 55 feet allowing room for additional trails, if ever needed. The transmission line easements are also consistent with the overall conservation goals of the passive park as they provide natural habitat and corridors for native plant and animal species. As such, no adverse effects to the West Point River Park Trails are reasonably anticipated.

5.1.2.3 <u>Mitigation</u>

No mitigation is required.

5.2 Floodplains

5.2.1 Affected Environment

Executive Order 11988 directs Federal Agencies to avoid, to the greatest extent possible, the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. The location of floodplains and other flood hazard areas are to be identified using maps produced by the U.S. Department of Housing and Urban Development or the Federal Emergency Management Agency (FEMA), if such maps exist.

Such mapping does exist for the project area. The cities of West Point and LaGrange along with Troup County are listed as "participating communities" in the FEMA National Floodplain Program. As seen on map panels (specifically, map panels: 13285C0143E, 13285C0144E, 13285C0231E, 13285C0230E, 13285C0229E, 13285C0240E, 13285C0220E, and 13285C0218F), floodplains are located throughout the proposed project but most notably along the southern half of the project near the city of West Point. Here floodplains associated with Long Cane Creek and the Chattahoochee River are extensive. The floodplains are associated with both components of the project: the substation with metering and the transmission line. In total, approximately 3.8 acres of 100 year and 500 year floodplain are associated with the substation site, and another 34.1 acres are associated with the transmission line corridor.

5.2.2 Environmental Consequences

While areas designated by FEMA as 100 and 500 year floodplain are located along the proposed substation site, the station is being designed to avoid all impacts: Portions of the property lying within the floodplain of the Chattahoochee River will not be cleared of woody vegetation or developed for the operation of the proposed substation. Additionally, reaches of the 100 and 500 year floodplain will be protected from any potential erosion associated with the construction of this component of the project by physical and structural erosion control methods, which are documented in the Georgia Transmission's National Pollutant Discharge Elimination System (NPDES) Control Plan. The preliminary development plans are shown in **Figure 3.0** in **Appendix 9.1**.

As noted previously, floodplains are also present along sections of the proposed transmission line, most notably when adjacent to Long Cane Creek and the Chattahoochee River. While the vast majority of flood prone areas are spanned by the overhead transmission line, approximately 5 unguyed single-pole structures will be located within floodplains (**Figure 9.0, Appendix 9.1**). As published in previous bulletins, RUS determined that single-pole structures do not typically have a significant impact to flood attenuation or floodplain storage capabilities, nor do these structures change the pattern or magnitude of hydrologic flow.

However, it is important to note that 34.1 acres of floodplains occur along the transmission line. Of that 20.6 acres are currently forested and will be cleared of woody vegetation and underbrush as part of the proposed project. This removal of woody species vegetation and underbrush may to an unknown extent increase the rate and intensity in which rain contacts the ground. To reduce erosion and sedimentation, the ROW will have temporary ground cover and later permanent, evenly distributed vegetative cover with a density of at least seventy percent in compliance with state and federal NPDES regulations. Also, the ROW will not be compacted. Rather it will remain a permeable surface allowing the continued infiltration of rainwater. Given the above, Georgia Transmission does not reasonably anticipate that the construction of the proposed metering substation nor the transmission line will have an adverse effect on FEMA designated floodplains.

5.2.3 <u>Mitigation</u>

No mitigation is required.

5.3 Wetlands and Waters

5.3.1 Affected Environment

Section 404 of the Clean Water Act charges the U.S. Army Corps of Engineers (USACE) with the regulation of discharges of "dredged or fill" materials into water of the United States, including wetlands and other special aquatic sites. Activities associated with the construction and maintenance of transmission projects which require the discharge of dredged or fill material may have to be authorized by Individual or General Nationwide Permits from the U.S. Army Corps of Engineers (USACE).

Georgia Transmission considered the location of early planning grade wetlands as shown on the USFWS National Wetland Inventory (NWI) maps, lidar, and hydric soils mapping units identified by the NRCS during siting activities. Once a preferred site and route were identified, Georgia Transmission contracted with Sligh Environmental Consulting, Inc. (SECI) to identify and delineate wetlands or waters along the proposed project. In all, 108 jurisdictional features were identified along the proposed project, including 58 waters and 50 wetlands (**Figure 10.0, Appendix 9.1**). No jurisdictional features are associated with the substation with metering. All are found along features of the 16.5 mile transmission line corridor and off ROW access roads. In addition to the surveyed jurisdictional features, 31 gullies or erosional features (G/EF) were found along the proposed Project. The gullies/erosional features are non-jurisdictional drainages that do not exhibit signs of groundwater contribution or hydric soils. For more information, please, see the *Ecology Survey Report* in **Appendix 9.4**.

5.3.2 Environmental Consequences

Whenever possible, existing roads and/or existing water crossings will be used to access each structure associated with this transmission line portion of the project. When expansive wetland or water features prevent access down the transmission line easement, off ROW access roads are evaluated and pursued. However, impacts to jurisdictional features are sometimes unavoidable and crucially necessary as access to each structure is required to construct, and later maintain, lines.

Georgia Transmission intends to improve approximately five (5) existing crossings, as well as install approximately eight (8) new stream crossings along the transmission line portion of the project. All proposed impacts satisfy the USACE General Conditions of the current Nationwide Permits (NWP) issued in January 2021 and the Savannah District's Regional Conditions issued in March 2021. Specifically, proposed impacts may be permitted under NWP 3 for maintenance activities and NWP 57 for electric utility line telecommunication activities. According to Regional Conditions, a Pre-Construction Notification (PCN) is required if more than 0.10 acres of wetland or 0.01 acres of perennial or intermittent stream are impacted for a single and complete project. Projected impacts may exceed this threshold, and currently Georgia Transmission anticipates submitting a PCN to the Corps of Engineers.

5.3.3 <u>Mitigation</u>

Per the current Savannah District Regional Conditions issued in March 2021, a compensatory mitigation plan is required for NWP projects that result in adverse effects to 0.1 acre or more of wetland and/or 0.01 acre or more of perennial or intermittent stream that results in a loss in aquatic function. For a total linear project, if the sum of the adverse effects from all individual single and complete

projects meet or exceed the thresholds above, mitigation is required for all adverse effects that would result from the construction of the total linear project.

The project will require a compensatory mitigation plan as the sum of impacts will likely exceed 0.1 acre of wetland and/or 0.01 acre of stream. The preferred form of compensatory mitigation for a NWP-authorized project in the Savanah District is the purchase of stream and/or wetland credits from a Corps of Engineers-approved commercial mitigation bank. The most recent purchase guidance issued by the Savannah District will be followed by Georgia Transmission to ensure compliance.

5.4 Biological Resources

5.4.1 ESA Listed Threatened and Endangered Species

5.4.1.1 Affected Environment

Section 7 of the Endangered Species Act requires every Federal agency, including RUS, to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action it authorizes is not likely to jeopardize the continued existence of any "listed species" (threatened or endangered plants or animals) or result in the destruction or adverse modification of designated critical habitat. Georgia Transmission's consulting biologist, on behalf of Georgia Transmission, reviewed the tentative list of known protected species from the USFWS Information, Planning, and Conservation System (IPaC) database. In addition to consulting IPaC, Georgia Transmission requested technical assistance from the USFWS, particularly, the Georgia Ecological Services Field Office, on March 6, 2025. Additional information was provided by request on March 18, 2025. As a proposed electric energy project, the technical assistance provided by USFWS included a streamlined project review under the National Energy Emergency as per Executive Order 14156 signed on January 20, 2025.

SCIENTIFIC NAME	COMMON NAME	FEDERAL STATUS	STATE STATUS		
MAMM	AL				
Perimyotis subflavus	Tricolored Bat	PE	None		
BIRD	S				
Grus americana	Whooping Crane	EPNE	None		
Laterallus jamaicensis spp. jamaicensis	Eastern Black Rail	Т	Т		
INSEC					
Danus plexippus	Monarch Butterfly	С	None		
REPTII	REPTILES				
Macrocheelys temminckii	Alligator Snapping Turtle	РТ	Т		
PLAN	ΓS				
Arabis georgiana	Georgia Rockcress	Т	Т		

TABLE 5.0: Species Protected Under ESA

As shown in **Table 5.0**, the IPaC review identified six (6) federal species with a potential to occur within the project vicinity: the Georgia rockress (*Arabis georgiana*), whooping crane (*Grus americana*), tricolored bat (*Perimyotis subflavus*), eastern black rail (*Laterallus jamaicensis spp. Jamaicensis*), monarch butterfly (*Danus Plexippus*), and alligator snapping turtle (*Macrocheelys temminckii*). These six species have varying levels of protection under the ESA—threatened, endangered, candidate, proposed threatened, proposed endangered, and experimental, non-essential population. Designated critical habitat was not identified in IPaC for any of these species.

5.4.1.2 Environmental Consequences

After reviewing this information, field studies of the project area were conducted to verify the conditions onsite and to determine if any protected species, or their habitats, were present. While the entire project area was surveyed, no aquatic surveys or mist netting for bats were conducted. No federally protected species were observed during the ecological surveys conducted from February 28-March 20, 2024; however, suitable habitat was observed for four of the federally protected species identified during desktop research. As detailed within the ecology survey report in Appendix 9.4, forested areas that provide habitat for the tricolored bat as well as aquatic habitats that potentially provide habitat for the alligator snapping turtle and the whooping crane are present. Suitable habitat is also present for the monarch butterfly. While suitable habitat is present, the proposed project will either have no effect or will not likely jeopardize the continued existence of any listed species. Please find the USFWS letter of concurrence in Appendix 9.5.

Tri-Colored Bat (Federal, Proposed Threatened)

A survey for the tri-colored bat was not conducted within the proposed project area; however, in Georgia, the range for the tricolored bat is statewide. The forested portions of the project area, particularly open forestland with large trees and woodland edges, provide preferred habitat for summer and winter roosting. Large culverts associated with adjacent roadways like I-85 may also be utilized during various times of the year. Though not officially listed, the USFWS is recommending that tree clearing be avoided from May 1 – July 31 (non-volant pup season) and from December 1 – February 28 (winter hibernation) for this species.

All tree removal activities will occur outside of the pup season; however, any remaining areas not cleared during the first phase of clearing beginning as early as August 2025 may extend into the winter hibernation period. Given that the range of this species is statewide and that there is amble habitat outside of the project area, which requires a relatively small amount of linear clearing (approximately 115 acres), the proposed project will **not likely jeopardize** the continued existence of this species.

Whooping Crane

Whooping cranes regularly travel through Georgia during migration and a small number of individuals have been documented wintering in the southern portion of the state. Nesting occurs in shallow herbaceous wetlands within prairies, grasslands, or poorly drained areas. During migration this species uses shallow river flats but can also be found in agricultural fields. Preferred wintering sites include Gulf Coastal brackish marshes and estuaries, herbaceous freshwater wetlands, and agricultural landscapes with adequate food resources. The proposed project would not impact suitable nesting or wintering habitat for this species, and the impacts to any wetland or floodplain habitat would not affect migrating whooping cranes as amble amounts of each exist outside the project area. As such the proposed project will have **no effect** on this species.

Eastern Black Rail (Federal, Threatened):

The species is found throughout the Gulf Coast, inland areas, and the Atlantic Coast from Connecticut to Florida with resident populations found from North Carolina to south Florida. There are known concentrations in New Jersey; Chesapeake Bay; Cedar Island, North Carolina; Bear Island WMA, South Carolina; and the St. Johns River, Florida. The project site contains emergent wetlands, but they are not typical of a freshwater marsh habitat. Since the project corridor does not contain habitat suitable to support this species, it will have <u>no effect</u> on the eastern black rail.

Monarch Butterfly (Federal Candidate Species)

Foraging habitat for adult monarch butterflies is available within the project area, particularly along non-agricultural sections of the existing transmission line that is parallelled by the proposed project for over 9-miles and maintained roadsides. Routine maintenance of this existing line creates a habitat with only low growing vegetative species that resemble the fields and prairie-like habitats well suited for this species. In the long run, the proposed project and other maintained corridors could be beneficial to the monarch. As such, the project will **not likely jeopardize** the existence of the monarch butterfly.

As part of the requested technical assistance, the USFWS suggests the following voluntary activities in relation to the monarch butterfly: 1) Planting (recommended) or seeding of native milkweed and native nectar plants with an aim for diversity of species and bloom timing (note: organically grown Georgia sourced plants are best; common milkweed (Asclepias syriaca) is not native to Georgia and is an invasive concern; and tropical milkweed (Asclepias curassavica) is also not native and potentially harmful); 2) Brush removal to promote habitat with native milkweed and native nectar-producing plants; 3) Targeted hardwood control when thinning woodlands on timberlands and selecting herbicides that preserve the herbaceous layer of plants when doing soil prep; 4) Prescribed burning (outside the growing season for native milkweeds; in patches or smaller units is recommended) to promote suitable habitat on a 2-3 year rotation in the Piedmont, 2 year rotation on the coastal plain, and 3-5 year rotation in the mountains; 5) Creating or preserving suitable habitat on idle lands or set-asides. For additional information, please visit Georgia Ecological Services' guidance for Monarch Conservation in Georgia; 6) Conservation mowing (*i.e.*, mowing only November – March) to enhance native floral resource habitat; 7) Targeted herbicide treatments (outside the growing season of native milkweeds) to restore suitable habitat; 8) Invasive species management; and 9) Contributing to our knowledge base and help inform conservation efforts by reporting your sightings of monarch butterflies, caterpillars, and milkweed on the Journey North website https://journeynorth.org/monarchs.

Alligator Snapping Turtle (Federal, Proposed Threatened):

The Chattahoochee River is adjacent to the project and could provide suitable habitat for the alligator snapping turtle. To protect water quality, erosion and sediment control measures will be utilized as required under the National Pollutant Discharge Elimination System (NPDES) storm water construction permit and Section 404 program. Georgia Transmission will also comply with state-mandated stream buffers. Given these measures, it is not expected that water quality will be impacted, and the proposed project will <u>not likely jeopardize</u> the existence of this species.

Georgia Rockress (Federal, Threatened):

Although it is occasionally found in adjacent moist forests or woodlands, it will not persist in heavily shaded conditions. It requires high to moderate light conditions, and occurs on soils that have a circumneutral to slightly basic pH. It often occurs with eastern red cedar, black oak (Quercus velutina), sugar maple (Acer saccharum), chestnut oak (Quercus prinus), and oakleaf hydrangea (Hydrangea quercifolia). No rocky slopes, terraces, or bluffs are present within the project corridor. The majority of other forested habitats consist of fully shaded environments. No Georgia rockcress was observed during the ecology survey, and none are listed by the GDNR as occurring in close proximity to the project. As such <u>no</u> <u>effect</u> to the Georgia rockress is anticipated.

5.4.1.3 <u>Mitigation</u>

While suitable habitat is present, the proposed project will either have no effect or will not likely jeopardize the continued existence of any listed species. Please find the USFWS letter of concurrence in **Appendix 9.5**. As such, no mitigation is required.

5.4.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. §§ 703 - 712) implements four different treaties or conventions between the U.S., Great Britain (on behalf of Canada), Mexico, Japan, and the Soviet Union (Russia) for the protection of migratory birds. The MBTA protects more than 800 species of birds by prohibiting take—the pursuing, hunting, taking, capturing, killing, or attempting of any of the foregoing to migratory bird species as well as to their eggs and nests—without permission from the USFWS. While the NRCS (2012) states that migratory birds are essentially all wild birds found in the United States, except the house sparrow, starling, feral pigeon, and resident game birds such as pheasant, grouse, quail, and wild turkey, a complete list of regulated species may be found in 50 CFR Part 10.13.

5.4.2.1 Affected Environment

Given the number and diversity of species regulated by the MBTA, one can extrapolate that migratory birds may be found in a wide variety of habitats, including but not limited to forests, wetlands, and waterways or coastal areas (Ewert, 2008).

Migratory birds are therefore likely located throughout the proposed project area and surrounding areas. The USFWS (2025) advises that one way to identify if an activity may affect migratory birds is to look at common stressors-vegetation alteration, vegetation removal, ground disturbance, structures, noise, light, chemicals and human presence. As such, the affected for the proposed project consists of the areas where there will be ground disturbance and/or vegetation removal. This consists of approximately 115 acres for the transmission line component of the project; and approximately 6.0 acres for the substation.

5.4.2.2 Environmental Consequences

Migratory birds are located throughout the project but their concentrations and susceptibility to stressors fluctuate throughout the year: While noting that this is not always feasible, the USFWS (2025) recommends avoiding vegetation removal and maintenance activities during nesting and breeding seasons to not unnecessarily disturb birds. Aligning with this recommendation, land disturbing activities could start as early as August 2025, which is at the end of breeding season for many species that have a strong probability of occurring along the project. Please see the chart from IPaC that overlays probability of presence with the breeding seasons of various bird species in **Table 6.0**.

TABLE 6.0: IPaC Probability of Presence Summary for Migratory Birds

probability of presence breeding season survey effort - no data

SPECIES Bald Eagle Non-BCC Vulnerable	JAN	FEB	MAR	APR	MAY	JUN - +	JUL IIII	AUG 	SEP	OCT	NOV	DEC
Chimney Swift BCC Rangewide (CON)	++++	++++	╪╪╢╪	111+		11+1	11++	01114		∎∎∎∔	++++	++++
Chuck-will's-widow BCC - BCR	++++	++++	++++	+1+1	+[+	 ++	+++++	++++	++++	++++	++++	++++
Eastern Whip-poor- will BCC Rangewide (CON)	++++	++++	++++	++++	+	<u> </u>	+ <mark>∎</mark> ∔+	+++ +	++++	++++	++++	++++
Prothonotary Warbler BCC Rangewide (CON)	++++	++++	++++	++ <mark>I</mark> +	+++•	-+• •	++++	++++	+1++	++++	++++	++++
Red-headed Woodpecker	####			+111	<u> </u>]+	101	[+]]			III	¢###	##+#
Rusty Blackbird BCC - BCR	+**+	++++	₩₩++	++++	++++•	-+++-	++++ -	+++++	++++ -	++++	+++++	+##
Wood Thrush BCC Rangewide (CON)	++++	++++	++++	╪╢╢╢	11+1	11+1	UT[++	+#∐ ∔ 4	₩###	++++	+++++	+++

Other beneficial practices that the proposed project will employ to minimize injury or killing of migratory birds is to design the proposed transmission line in a way to reduce bird electrocutions and collisions. As such, the proposed project will meet or exceed best practice guidelines and measures outlined within RUS' *Avian-Safe Design Standards* and the Avian and Power Line Interactions Committee's *Suggested Practices for Protection on Powerlines: The State-of-the-Art 2006.* In addition, Georgia Transmission currently has an active Special Purpose Utility (SPUT) Permit through the USFWS that authorizes utilities to collect, transport and temporarily possess migratory birds found dead on utility property

structures, and rights-of-way. The SPUT permit allows Georgia Transmission to better monitor avian mortality

5.4.2.3 Mitigation

No mitigation is required.

5.4.3 Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) of 1940, as amended, prohibits anyone without a permit issued by the USFWS from incidental or purposeful "taking" of bald or golden eagles, including their parts, nests, or eggs. BGEPA defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb." The word disturb is also defined by the BGEPA. It means "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

5.4.3.1 <u>Affected Environment</u>

According to the USFWS (2025), golden eagles are known to exist throughout the world. In the United States, they're most commonly found in the western half of the country. However, they have been spotted in the east, especially during migration or winter. In contrast, the bald eagle is solely native to North America and in relation to the United States may be found throughout its contiguous lands.

In terms of the project, there is no evidence of golden eagles. There are, however, several areas where open water habitat associated with the Chattahoochee River are crossed. These areas may contain suitable foraging habitat for bald eagles, which according to Georgia Department of Natural Resources (GDNR) are known to occur approximately 0.99-mile to the west of the project corridor.

5.4.3.2 Environmental Consequences

The entire project corridor was traversed by SECI. During this pedestrian survey, no bald eagles were heard or observed. Similarly, no bald eagle nest sites were identified within or adjacent to the project area. Additionally, the proposed transmission line will be designed in a way to eliminate or reduce bird electrocutions and collisions. As such, the proposed project will meet or exceed best practice guidelines and measures outlined within RUS' *Avian-Safe Design Standards* and the Avian and Power Line Interactions Committee's *Suggested Practices for Protection on Powerlines: The State-of-the-Art 2006.* Given this lack of evidence of existing eagles nest sites along with avian safe design measures, it is unlikely that the proposed project will result in "take as defined by the BGEPA. Thus, no effect to bald and golden eagles are reasonably anticipated.

5.4.3.3 <u>Mitigation</u>

No mitigation is required.

5.4.4 General Fish, Wildlife, and Vegetation Issues

5.4.4.1 <u>Affected Environment</u>

Georgia Transmission contracted with SECI to conduct ecological surveys of the proposed project. SECI conducted field visits periodically from February 28 – March 20, 2024. Using a combination of observations from the field and aerial photography, SECI was able to denote a wide variety of urban and natural environments along the project corridor. In all, six distinctive upland environments were identified: maintained rights-of-way, pine plantations, mixed pine/hardwood forest, mixed hardwood forests, existing developments/roads, scrub/shrub upland. In addition, three distinctive wetland environments, characterized as either emergent, forested, or as waters (streams, rivers, open bodies of water), were also identified.

	AFFECTED ENVIRONMENT				
	Maintained ROW	65.7			
D	Pine Plantation	51.7			
JPLAND	Mixed Pine / Hardwood Forest	40.5			
	Mixed Hardwood Forest	16.7			
	Scrub / Shrub	1.6			
ND	Emergent Wetland	9.6			
ETLA	CANAL Processed Wetland Forested Wetland Stream / River / Open Waters				
M					
	TOTAL 194.:				

TABLE 7.0: Vegetational Communitie	es Along Proposed Project
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While pine plantations and mixed hardwood forests dominate the 11 acresite for the metering station, maintained rights-of-way is the predominate community for the 183 acres comprising the transmission line corridor. For more information about the dominant vegetation and/or characteristics of each community, please, the *Ecology Survey Report* prepared by SECI in **Appendix 9.4**.

5.4.4.2 Environmental Consequences

The construction of the proposed project will require approximately 194 acres of easement and/or fee simple property. More than one-third (34%) of the project corridor consists of existing maintained transmission line ROW as the proposed project collocates with other linear facilities and partially shares easements with these existing utilities. As so much of the project is already maintained utility ROW, only 128 acres will be converted to electric utility easement and/or fee simple property. Environments adjacent to the proposed project will not be converted into utility easement, i.e., affected by the proposed project.

For the conversion into utility easement, the following will occur: Vegetation will be removed within the limits of disturbance for the proposed substation site. Woody vegetation within the proposed transmission line ROW will need to be altered or removed. The transmission line ROW along public roads will be approximately 25 to 30 feet in width. Cross-country sections of the transmission line projects will be 100 feet in width. Individual trees just outside the transmission line ROW deemed to be a danger tree (dead, diseased, or leaning trees) will be removed for the safe and reliable operation of the transmission line facilities.

Given that adjacent environments will not be converted and that the proposed project accounts for less than 1% of the 285,258 acres comprising Troup County (Troup County Comprehensive Plan: Community Assessment (2010)), the amount of land being converted is nominal and no adverse impacts to general land use or vegetational communities is anticipated.

5.4.4.3 <u>Mitigation</u>

No mitigation is required.

5.5 Cultural Resources and Historic Properties

Section 106 of the National Historic Preservation Act (NHPA) requires that any Federal agency take into account the effects of their undertakings on historic properties. Historic properties, for the purposes of Section 106 review, are those properties listed or eligible for listing in the National Register of Historic Places (NRHP). Georgia Transmission with the approval of RUS and in accordance with 36 CFR § 800.14(b)(2) has an alternate Section 106 process documented within a Programmatic Agreement (PA) executed by RUS and the Georgia State Historic Preservation Office (SHPO), and Georgia Transmission.

Regulations allow a federal agency, which in this case is RUS on the behalf of Georgia Transmission, to pursue a "program alternative (PA)" when it wants to create a Section 106 process that differs from the standard review process and that will apply to all undertakings under a particular program. In this case, the PA applies to all construction, modification, and relocation projects undertaken by Georgia Transmission.

Under the terms of this PA, Georgia Transmission contracts with qualified professionals in architectural history and archeology to identify potential historic properties through review of Georgia State Files and potential field surveys within the Area of Potential Effect (APE). As part of the alternate Section 106 process outlined in the PA, a transmission project may proceed to construction prior to being reviewed and approved by the SHPO. This is largely due to the fact that many impacts, which are similar in nature or repetitive, are mitigated programmatically through sponsorship of historic research projects approved jointly by RUS and SHPO. There are, however, exceptions: If a project is determined to have an adverse effect on a National Historic Landmark, a National Register-listed historic property, a traditional cultural property, or an eligible historic district, Georgia Transmission must initiate consultation with the SHPO.

5.5.1 Archeological Resources

Historic properties listed in or eligible for listings in the NRHP include significant historic and prehistoric archaeological resources. To determine whether there are archaeological resources eligible for listing in the NRHP, Georgia Transmission has contracted with Brockington and Associates, Inc. (Brockington) to complete an Intensive Archaeological Resources Surveys of the electrical facilities comprising the proposed project. In terms of archeology, the APE for the proposed project consists of the parcel of land needed for the substation with metering the easements required for the transmission line plus potential off ROW access roads.

5.5.1.1 <u>Affected Environment</u>

Prior to field surveys, Brockington performed a literature review, which included an examination of records about previous investigations at the University of Georgia Archaeological Site Files and a review of maps and photographs of the project area. This literature review revealed seven previously recorded archeological sites located within the APE (9TP993, 9TP996, 9TP999, 9TP1000, 9TP1037, 9TP1040, and 9TP1101.) These included five prehistoric artifact scatters, one prehistoric lithic scatter, and one historic cemetery. Of these, one was previously recommended eligible for the NRHP (9TP993), one was recommended potentially eligible (9TP1037), four were recommended not eligible (9TP996, 9TP999, 9TP1000, 9TP1040), and one was unassessed (9TP1101).

Conducted in February and September 2024, Brockington's field investigation consisted of pedestrian surface inspection and systematic subsurface shovel testing at 30-meter intervals within the APE. No cultural materials or features were identified at Oseligee Creek Substation site; however, of the seven previously recorded sites (9TP993, 9TP996 9TP999, 9TP1000, 9TP1037, 9TP1040, and 9TP1101), seven isolated finds, and four new sites (9TP1137, 9TP1138, 9TP1139 and 9TP1140) were identified along the LaGrange Primary – Oseligee Creek line. Two of the newly identified sites (9TP1138 and 9TP1139), all isolated finds, and the portions of the seven previously recorded archeological finds and sites that fall within the APE of the proposed project are recommended ineligible for the NRHP in regards to Criterion D as they lack significant data potential. Sites 9TP1137 and 9TP1140, a historic house site and a historic cemetery, respectively, are recommended potentially eligible for the NRHP. Please see the survey reports in Appendix 9.6 for more details.

5.5.1.2 Environmental Consequences

Since Sites 9TP1137 and 9TP1140 are recommended potentially eligible for the NRHP, the sites will be preserved in place by Georgia Transmission. Essentially, any woody vegetation will be removed utilizing hand clearing techniques, and alternate access paths, which is readily available around each site for construction and future maintenance activities, will be used. No vehicular traffic will be allowed within these areas preserved in place. Additionally, fencing will be installed along the periphery of 9TP1140. Based on the enclosed intensive archeological survey reports dated October 2024 and GTC's proposed management strategies, a finding of <u>no adverse effect in accordance with 36 CFR §</u> <u>800.5(b)</u> is appropriate for archeological resources.

5.5.1.3 <u>Mitigation</u>

No mitigation is required.

5.5.2 Architectural History

Historic properties eligible for listing in the NRHP include significant historic structures as well as significant archaeological sites. To determine whether there were historic structures eligible for listing in the NRHP within the area of potential effect, Georgia Transmission contracted with NV5, Inc. (NV5). NV5 surveyed the project study area of the proposed project for historic resources in August 2022 and later completed a Historic Resources Survey Report and Assessment of Effects Recommendation for the proposed project in September 2024.

5.5.2.1 Affected Environment

During these surveys, NV5 identified approximately 162 resources that appeared to be 50 years of age or older within the project study area, including the Henry and Lura Miller House, a property already listed in the NRHP. This information was then used in the siting process of both components of the project to help minimize and/or avoid physical and visual impacts to historic properties in the area. This resource, Resource 19, and others are shown in **Figure 11.0** in **Appendix 9.1**.

In terms of historic properties, the APE for the proposed project consists of the parcel of land needed for the substation and the easements required for the transmission line plus potential off ROW access roads. It also includes the viewshed of the project. Please see the subsections below and survey reports in **Appendix 9.7** for more details.

5.5.2.2 Environmental Consequences

As described previously, 162 historic resources were documented by NV5. With the APE in mind, NV5 completed a Historic Resources Survey Report and Assessment of Effects Recommendation for the proposed project in September 2024. As a result of these efforts, the proposed projects impact on resources within its APE were evaluated.

Of the identified resources, 21 were recommended eligible for inclusion in the NRHP. NV5 in accordance with 36 CFR 800.5, the Criteria of Adverse Effect, has recommended that the proposed undertaking will result in a finding of <u>no historic properties affected</u> for eleven resources (Resource 3, Resource 5, Resource 7, Resource 8, Resource 10, Resource 26, Resource 62, Resource 63, Resource 135, Resource 140, and Resource 141) and a finding of <u>no adverse effect</u> to ten resources (Resource 2, Resource 4, Resource 6, Resource 9, Resource 32, Resource 69, Resource 109, Resource 121, Resource 143, and Resource 163). The proposed project, particularly the LaGrange Primary – Oseligee Creek 230kV Transmission Line component, would result in an adverse effect to the Henry and Lura Miller House (Resource 19) that is listed property on the NRHP. Based on the enclosed assessment, a finding of <u>adverse effect to the Henry and Lura Miller House in accordance with 36 CFR § 800.5</u> is appropriate for historic structures.

5.5.2.3 Mitigation

As part of the alternate Section 106 process outlined in the PA, adverse effects that are similar in nature or repetitive are mitigated programmatically through sponsorship of historic research projects

approved jointly by RUS and SHPO. As this project adversely impacts a historic property listed on the NRHP, Georgia Transmission initiated consultation with RUS and the Georgia SHPO.

Through consultation, Georgia Transmission was able to shift the alignment of the proposed transmission line to minimize the amount of easement and clearing required along the affected property. Per a letter dated January 3, 2025 from the Historic Preservation Division, the office of the SHPO, "it is HPD's understanding that the proposed transmission line has been shifted to the greatest extent possible outside the viewshed of the contributing landscape features of The Henry and Lura Miller House and therefore it is HPD's opinion that adequate measure have been taken to attempt to minimize or avoid the adverse effect to The Henry and Lura Miller House. As such, it appears that the adverse effect resulting from the proposed construction of a transmission line through a portion of the NRHP-listed The Henry and Lura Miller House is unavoidable."

As the impacts to The Henry and Lura Miller House were deemed unavoidable as well as similar in nature to the adverse effects resolved programmatically through the aforementioned PA, no additional mitigation measures are required for the impacts to The Henry and Lura Miller House by RUS and SHPO.

5.5.3 <u>Tribal Consultation</u>

The NHPA and Section 106 regulations establish that Indian tribes and Native Hawaiian organizations are one of the parties that have a consultative role in the Section 106 process for all RUS proposals/ undertakings, whether the project is located on or off tribal lands. The regulations also specifically address the importance of "properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria", and the requirement of federal agencies to consult with tribes when such properties may be affected by the proposal.

On 9/7/2023 the following Indian tribes were notified of the proposed project: the Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Coushatta Tribe of Louisiana, and Muscogee (Creek) Nation. A similar set of Indian tribes were notified of the recommended finding for the proposed project on 2/9/2025. The correspondence is in **Appendix 9.8**. To date, more than thirty days later, no Indian tribe has responded to either the notification or finding letter. Nor have any asked to participate in the Section 106 review of the reference project.

5.6 Aesthetics

As development in rural areas increases in scope and complexity, aesthetic or visual impacts may be a concern for the public. Additional consideration should be given to proposals near areas of high scenic value, e.g., designated wilderness areas, parks, recreational areas, historic sites, wild/scenic rivers as well as Formally Classified Lands.

5.6.1 Affected Environment

As documented previously, the proposed project is adjacent or requires easements from lands that are administered by federal and local governments— West Point Lake and West Point Park River Trails. These areas may be considered "Formally Classified Lands." In addition, the project is in the viewshed of a listed historic site, The Henry and Lura Miller House.

5.6.2 Environmental Consequences

West Point Lake

The proposed project was not sited along any part of the West Point Lake property and is only adjacent, or rather in close proximity, as the project is approximately 0.5 miles south of the dam and lake. As the two are separated by distance and forestland that serves a visual screen, the project should not be visible to West Point Lake.

West Point River Park Trails

Georgia Transmission is proposing to locate approximately 1.4 of the 16.5 miles of the proposed transmission line within this local passive park. The portion of the local park affected by the proposed project is already encumbered by another high voltage transmission line. Many of the trails are actually located within the easement of the existing high voltage line, apparently taking advantage of the cleared, maintained nature of transmission line rights-of-way. Since existing electric transmission facilities are currently onsite, the addition of another facility should not adversely or significantly alter the aesthetics of the park.

Henry and Lura Miller House

The proposed project will have an adverse effect to the Henry and Lura Miller House located in West Point, Georgia. As the impacts to The Henry and Lura Miller House were deemed unavoidable as well as similar in nature to the adverse effects resolved programmatically through the aforementioned PA, no additional mitigation is required by RUS and SHPO.

5.6.3 Mitigation

No additional mitigation is required. Adverse visual effects to historic resources have been minimized as much as possible and are mitigated through the terms of the Programmatic Agreement.

5.7 Transportation

US Hwy 27 /

Hamilton Rd

5.7.1 <u>Roads</u>

The proposed project crosses and/or parallels a series of local, state, and federal roads within Troup County, Georgia. These roads will be utilized to transport materials as well as for accessing the proposed project during construction and maintenance activities. Where traffic control is required, Georgia Transmission will abide by the rules of the local and state governments and agencies requiring these safety measures.

		,	
S Ogletree St	Fort Dr	McGraw Rd	Interstate 85
Edgewood Ave	Whitesville Rd	Sandtown Rd	Kia Blvd
Pegasus Pkwy	Orchard Hill Rd	Cannoville Rd	Webb Rd

Old Hutchinson

Mill Rd

Lukken Industrial

Dr

US Highway 29 /

W Point Rd

5.7.2 <u>Water</u>

The USACE also regulates work done in, over, or under navigable waters as required by Section 10 of the Rivers and Harbors Act of 1899. The proposed transmission line will cross over the Chattahoochee River, a navigable water of the US. As such, a permit from USACE is required and will be obtained. No impacts to navigable waters are anticipated

5.7.3 <u>Air</u>

Federal Regulations Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for evaluating the effect of the construction or alteration on operating procedures, determining the potential hazardous effect of the proposed construction on air navigation, identifying mitigating measures for enhanced safe air navigation and charting new objects.

The LaGrange Calloway Airport is located within the northern half of project study area. Per FAR 77 criteria, the Federal Aviation Administration (FAA) Notice has been notified of 25 structures that pierced the Part 77 surface: structures 21 to 42 (**Figure 12.0, Appendix 9.1**). The resulting aeronautical studies determined that all 25 structures do not exceed obstruction standards and will not be a hazard to air navigation. The following three conditions, however, were placed on the project.

Conditions:

- Two (2) towers need to be lighted and marked per FAA AC 70/7460-1 M Change 1, Obstruction Marking and Lighting, red lights-Chapters 4, 5 (Red), & 15
 - a. 2024-ASO-16687-OE (STR 28)
 - b. 2024-ASO-16688-OE (STR 29)
- 2. Construction must start by 6/9/2026.
- 3. Construction equipment (e.g., cranes) that exceed the approved tower heights need to be permitted by FAA.

Please find the FAA determination letters in **Appendix 9.9**.

6. COORDINATION, CONSULTATION, AND CORRESPONDENCE

LOCAL

September 28, 2022 – Georgia Transmission contacted the City of Lagrange, Long Cane Creek Wastewater Treatment Plant regarding the possibility of collocating a segment of the proposed project on their property. Patrick Bowie, Director of Utilities, responded that the city would be able to work with Georgia Transmission on an easement agreement if a segment was located on their property.

March 6, 2023 – Geogia Transmission notified the city council, city manager, and mayors of the cities of Lagrange and West Point of the proposed project providing a description, justification, and map of the route.

March 31,2023 – Georgia Transmission met with the city manager, Ed Moon, in person and Sammy Inman, utilities director, about the proposed project mentioning that a section was located in a local park. The city responded favorably to the route.

STATE

March 6, 2023 – Georgia Transmission notified three Georgia Congressman of the proposed project: Representative Vance Smith, Representative Debbie Buckner, and Senator Randy Robertson.

October 31, 2024 – Georgia Transmission coordinated with Georgia SHPO regarding a potential adverse effect on a listed historic property, the Henry and Lura Miller House and other resources on the project.

FEDERAL

September 28, 2022 – Georgia Transmission contacted the USACE regarding the possibility of collocating a segment of the proposed property on the West Point Lake Property. Ben Williams, R.F., Supervisory Natural Resources Specialist, replied that the USFWS could not accommodate the utility in its proposed location.

March 6, 2023 – Georgia Transmission notified US Representative Drew Ferguson and US Senator Jon Ossoff of the proposed project providing a description, justification, and map of the route.

April 4, 2024– On behalf of Georgia Transmission, SECI, submitted requests to the USFWS IPaC website and to the WRD, Ga DNR for a list of protected species. A response with the species lists were also received on November 18, 2023.

February 25, 2025 – On behalf of RUS, Georgia Transmission initiated the completion of AD-1006 forms for the proposed Oseligee Creek 230/25kV Substation with the USDA NRCS.

March 6, 2025 – Georgia Transmission submitted a letter to the USFWS, Georgia Field Office and requested field office review of proposed determinations, as preliminary IPAC results suggested a may affect for the Tricolored bat.

OTHER

September 7, 2023 – On the behalf of RUS, Georgia Transmission initiated coordination efforts with tribes identified in TDAT as having a tribal interest in Troup County, Georgia. No responses were received.

February 11, 2025 – RUS consulted with Tribes identified in TDAT as well as others believed to have an ancestral interest in Troup County. RUS provided a finding letter and provided a 30-day comment period. No comments have been received to date.

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8. LIST OF PREPARERS

Primary Preparer:

Brooks, Tasha – Senior Environmental & Regulatory Coordinator, Environmental Services, Georgia Transmission, 1979 Lakeside Parkway, Tucker, Georgia, 30084

Geographic Information System (GIS) Analyst:

Hersey, Margaret (Maggie) - GIS Analyst, Merrick & Company c/o Georgia Transmission, 1979 Lakeside Parkway, Tucker, Georgia, 30084.

9. APPENDICES

- 9.1 Report Figures
- 9.2 Technical Justification
- 9.3 USDA, AD-1006 Form
- 9.4 Ecological Survey Report
- 9.5 USFWS, Agency Correspondence
- 9.6 Phase I, Archeology Survey
- 9.7 Historic Resources Survey and Assessment of Effects Recommendation
- 9.8 Tribal Coordination and Consultation
- 9.9 FAA Correspondence