

ENVIRONMENTAL ASSESSMENT
for construction of the
Lake Varner – Cornish Mountain 230 kV Transmission Line

Newton County, Georgia

Rural Development | Rural Utilities Service
Environmental and Historic Preservation Division

prepared by:

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List of Acronyms

ACSR - Aluminum Conductor Steel Reinforced
APE - Area of Potential Effect
APLIC - Avian Power Line Interaction Committee
BMP - Best Management Practice
CFR - Code of Federal Regulations
CWA - Clean Water Act
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
EO - Executive Order
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
GIS - Geographic Information Systems
GPC - Georgia Power Company
GTC - Georgia Transmission Corporation
HPD - Historic Preservation Division of Georgia Department of Natural Resources
IPaC - Information for Planning and Consultation
ITS - Integrated Transmission System
MEAG - Municipal Electric Authority of Georgia
NEPA - National Environmental Policy Act
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
RD – Rural Development
RUS - Rural Utilities Service
ROW - Right-of-way
S/S - Substation
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
USFWS - United States Fish and Wildlife Service
USGS - United States Geological Survey

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 Lake Varner – Cornish Mountain 230 kilovolt (kV) Transmission Line in Newton County, Georgia (the project). This facility is being constructed on behalf of Snapping Shoals EMC to serve a new load center north of the city of Covington.

Because Georgia Transmission plans to apply for project financing assistance from RUS, the proposal constitutes a federal action subject to review in accordance with USDA's procedures for integrating the National Environmental Policy Act (NEPA), 7 CFR Part 1b. 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 1b.3. This EA identifies and evaluates the significance of environmental impacts associated with the construction, maintenance, and operation of the transmission projects associated with the Lake Varner – Cornish Mountain 230 kV Transmission Line Project. The EA will demonstrate the Agency's compliance with the requirements of the NEPA, 42 United States Code [USC] §§ 4321-4347. As the lead federal agency, RUS must evaluate the Project's effect on historic properties under Section 106 of the National Historic Preservation Act, 54 U.S.C. §§ 300101 – 306108, 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 (EA) is being prepared in accordance with Executive Order 14156, the National Energy Emergency.

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 Lake Varner – Cornish Mountain 230 kV Transmission Line¹. RUS's

¹ The project was formerly known as the "AWS Covington – Cornish Mountain 230 kV transmission line". This name may still appear in some supporting documents.

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 USDA's 7 CFR 1b.5. 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: Snapping Shoals EMC will serve a new load center in Newton County, north of the city of Covington. The new load is expected to be 132 megawatts (MW) in 2026 and grow to 669 MW in 2030. To meet the demand of the growing load center, planning efforts identified the need for new 230 kV transmission line and a new 230/34.5 kV load serving substation. To meet the extremely demanding schedule for this project, construction on the Lake Varner substation began in November 2025; therefore, Georgia Transmission is not requesting funding for construction of this substation and impacts from its construction are not included in this EA.

3. PROJECT DESCRIPTION

The project consists of the following actions:

3.1 Actions Requesting RUS Funding (The Project)

3.1.1 Lake Varner – Cornish Mountain 230 kV Transmission Line

Georgia Transmission will construct an approximately 5.2-mile 230 kV transmission line consisting of 52 single-pole structures. These 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 average span between poles is approximately 521 feet; however, spans range from 105 feet to nearly 885 feet. Pole heights range from 90 to 145 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 41.3 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 24.66 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.

Access for construction and maintenance of the transmission structures will occur along the acquired easements for the cross-country segments, or directly from adjacent roadways for the roadside segments. The only off-ROW access will be along a short, existing path on Georgia Power property to accommodate modifications to the existing Cornish Mountain Substation (see Figure 4.0). In this location, additional easement will be temporary, but could be up to 30 feet in width, and may require minor improvements, such as blading or smoothing of the ground surface and side-trimming of encroaching vegetation.

Georgia Transmission will modify the existing Cornish Mountain Substation (owned by Georgia Power) to tie the new Lake Varner – Cornish Mountain transmission line into the substation.

3.1.2 Covington #3 – East Social Circle 115 kV Transmission Line Modification

The proposed Lake Varner – Cornish Mountain 230 kV transmission line must cross over the existing Covington #3 – East Social Circle 115 kV transmission line. Therefore, approximately ten structures along the Covington #3 – East Social Circle 115 kV transmission will be modified to construct the proposed Lake Varner – Cornish Mountain 230 kV transmission line over it. This work will occur entirely within the existing Covington #3 – East Social Circle transmission line easement.

3.2 Actions Not Requesting RUS Funding

3.2.1 Lake Varner 230 kV Substation

Georgia Transmission is currently constructing a new 230 kV substation utilizing an 11-element breaker-and-a-half design with eight new 230/34.5, 150 MVA LTC transformers, and one 230 kV line termination as well as two future line terminations to serve the load center. This new substation is being constructed on a site developed by the customer, a data center. To meet the extremely demanding schedule for this project, construction on the Lake Varner substation began in November 2025; therefore, Georgia Transmission is not requesting RUS funding for construction of this substation and impacts from its construction are not included in this EA.

3.2.2 Lake Varner Substation Modification

The Lake Varner 230 kV substation is currently under construction by Georgia Transmission on an industrial customer's property. Once complete, the substation will be modified to tie the Lake Varner – Cornish Mountain 230 kV transmission line into the Lake Varner Substation. Further actions will also include modifying the substation to include four additional 230/34.5 kV, 150 MVA LTC transformers. This modification will occur within the substation fence.

4. PROJECT ALTERNATIVES

4.1 Physical Route Alternatives

Georgia Transmission evaluated corridors between the two project endpoints, the existing Cornish Mountain Substation and the Lake Varner Substation site, both in Newton 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 collocation 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 30 route segments and 14 routes were developed and later analyzed. The alternatives that the Route Selection Team determined to be the most suitable—Route A, Route D, Route F and Route M—are illustrated on the attached figures and detailed statistics on each route are available in Appendix 9.3.

4.1.1 No Action Alternative

The No Action Alternative would not meet the purpose and need of the project and was dropped from further consideration.

4.1.2 Route F

Route F is approximately 5.08 miles in length. It begins at the existing Cornish Mountain substation and travels west out of the substation to Gum Creek Road. The route follows Gum Creek Road south before turning east near Moore Road and travelling cross-country to GA Highway 81. The route then follows GA Highway 81 for a short distance before again turning east/northeast cross-country then joining with GA 142/Industrial Park Boulevard NE. The route follows this road, then turns east and south before following Flat Rock Road. The project then turns south onto the Customer's property until the route terminates into the Lake Varner Substation (see attached graphics).

Route F has the following additional statistics:

- No homes within easement / No home relocations
- 25 homes within close proximity (300 feet)
- 31 tax parcels are crossed by easement
- 8 potential historic resources within 1500 feet
- 22.6 acres of natural forest clearing required
- 3 USGS blue line stream crossings.
- 0.0 acres of wetlands within easement
- 1.0 acres of 100-year floodplain within easement

4.1.3 Preferred Transmission Line Route

Many of the alternatives, including the top four alternative routes, were considered reasonable routes for constructing the Lake Varner – Cornish Mountain 230 kV 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 F represented the preferred route.

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 roadways as much as possible. This route had fewer stream crossings, less impacts to floodplains, was in proximity to a moderate number of residences, and had one of the shortest routes of those considered. Although other routes under consideration would have co-located with existing infrastructure, these routes would have required the displacement of homes and raised significant concerns regarding the electrical reliability of having multiple lines in close proximity to each other. 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 project is located within Newton County, Georgia, outside the limits of the City of Covington, and within the Milstead and Jersey United States Geological Survey (USGS) 7.5-minute series topographic maps (see attached figures). The project is in the Southern Outer Piedmont Ecoregion. According to the USGS, “the Southern Outer Piedmont ecoregion has lower elevations, less relief, and less precipitation than [other areas of the Piedmont]. Loblolly-shortleaf pine is the major forest type, with less oak-hickory and oak-pine than in [other areas]. Gneiss, schist and granite are the dominant rock types, covered with deep saprolite and mostly red, clayey subsoils. The majority of soils are Kanhapludults. The southern boundary of the ecoregion occurs at the Fall Line, where unconsolidated coastal plain sediments are deposited over the Piedmont metamorphic and igneous rocks.” The project is located within the Upper Ocmulgee Watershed (Hydrologic Unit Code 03070103).

5.1 Land Use / Important Farmland / Formally Classified Lands

5.1.1 Important Farmland Soils

Through the passage of the Farmland Protection Policy Act (FPPA) of 1981 and the Final Rule for its implementation, 7 CFR Part 658, the U.S. Department of Agriculture 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 Department of Agriculture also has policies requiring the Department to consider the impact of its actions on prime farmland soils.

5.1.2 Affected Environment

Digital copies of the U.S. Department of Agriculture, Soil Surveys were reviewed to identify the location of important farmland soils along the proposed project corridor (see attached figures).

5.1.3 Environmental Consequences

Georgia Transmission does not anticipate having a significant impact to farmland soils in the area because agricultural activities may be performed on the acreage surrounding the transmission line corridor. It is also worth noting that according to Rural Development Instructions 1970-B, RUS does not require utility line construction projects to calculate the impact of converting agricultural lands to non-agricultural lands using National Resources Conservation Service (NRSC) form, AD 10006: Farmland Conversion Impact Rating. Therefore, no conversion of farmland soils to other uses will occur.

5.1.4 Mitigation

No mitigation is required.

5.1.5 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.

5.1.6 Affected Environment

There are no formally classified lands within the project footprint.

5.1.7 Environmental Consequence

None

5.1.8 Mitigation

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 long-term 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 identified using maps produced by the U.S. Department of Housing and Urban Development or the Federal Emergency Management Agency (FEMA). FEMA mappings of Newton County were reviewed.

According to the maps there are two areas of FEMA designated 100-year floodplain located along the proposed project (see Figure 7). In both locations, the transmission line is routed parallel to the existing interstate corridor and will cross the floodplain perpendicularly; however, no critical infrastructure will be located within the floodplain. Adjacent structures will be located outside the floodplain, and the floodplain will be crossed aerially with conductor. Therefore, the project will not affect the function of the floodplain.

5.2.2 Environmental Consequences

According to the maps there are no areas of FEMA designated 500-year floodplains, and one area of 100-year floodplain is located along the project (see attached figures). In this location, the transmission line is routed parallel to the existing roadway and mono-pole transmission line structures will be located roadside within the floodplain. Most of the floodplain will be crossed aerially with conductor.

It is important to note that approximately four (4) acres of floodplains occur along the entire transmission line route. Of that approximately two (2) 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 and will remain a permeable surface, allowing the continued infiltration of rainwater.

Given the above, Georgia Transmission does not anticipate that the construction of the project will have an adverse effect on or conversion of FEMA designated floodplains.

5.2.3 Mitigation

No mitigation is required.

5.3 **Wetlands and Waters**

GTC contracted with Jacobs Engineering Inc. (Jacobs) to delineate wetlands and waters within the project footprint, including the proposed transmission line right-of-way (ROW), substation and switching station sites, temporary construction ROWs, possible laydown yards, and off-ROW access roads.

Jacobs conducted ecological field studies within the proposed project survey area on August 14, 2025. Studies were conducted utilizing the methodology outlined in the 1987 U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual: Eastern Mountains and Piedmont Regional Supplement V 2.0. State waters were determined in accordance with guidelines provided in the Georgia Environmental Protection Division (EPD) document: Field Guide for Determining the Presence of State Waters that Require a Buffer.

Waters of the United States (WOTUS) are defined in 33 CFR Part 328 and protected by Section 404 of the Clean Water Act, which charges the USACE with the regulation of discharges of “dredged or fill” material into WOTUS, including wetlands and special aquatic sites. During the transmission line siting process, GTC considered the location of mapped wetlands shown on the US Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps as well as hydric soils identified by NRCS soil surveys for Newton County. GTC also considers the location of streams and drainage patterns shown on the USGS 7.5-minute Quadrangle Maps when siting new transmission facilities. Jacobs field delineated these features in order to assist GTC with the avoidance and minimization of direct impacts to WOTUS, Section 404 permitting, the creation of erosion and sedimentation control plans, and spill prevention control and countermeasures (SPCC) plans.

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 does not cross any navigable waters of the US; therefore, no impacts to navigable waters are anticipated.

5.3.1 Affected Environment

Field studies to identify wetlands were conducted within the transmission line ROW, substation sites, and within the project area. Jacobs delineated numerous waters and wetlands along the proposed transmission line routes, proposed sites, and other areas of the Lake Varner-Cornish Mountain Project (see report in Appendix 9.4).

Four (4) wetlands were delineated along the survey area. Two of these wetlands are characterized as palustrine forested wetland communities (PFO) and two as palustrine emergent wetland communities (PEM). Forested wetlands are dominated by hardwood tree species including sweetgum (*Liquidambar styraciflua*), green ash (*Fraxinus pennsylvanica*), various oaks (*Quercus* spp.), and black willow (*Salix nigra*). Emergent wetlands are dominated by soft rush (*Juncus effusus*), muscadine (*Vitis rotundifolia*), and other various sedges.

Field studies to identify streams (perennial, intermittent, and ephemeral), open waters, and non-jurisdictional gully/erosional features were also conducted within the proposed transmission line route, substation sites, and proposed access roads and laydown areas (see report in Appendix 9.4).

USGS delineates and defines watersheds as hierarchical Hydrologic Unit Code (HUC) systems. The watersheds range from large 2-digit regions to small 12-digit sub-watersheds. All components of the Lake Varner-Cornish Mountain Project are within the Lower Yellow River Watershed (HUC-10 – 0307010305) and the Upper Alcovy River (HUC-10 – 307010307). The proposed project crosses through the following HUC-12 sub-watersheds:

- Cornish Creek – 030701030708
- Dried Indian Creek-Yellow River– 030701030502
- Gum Creek – 030701030501

Five linear water features were delineated by Jacobs. These waters include jurisdictional and potentially non-jurisdictional streams (see report in Appendix 9.4). Two (2) waters are classified as perennial streams, one (1) as an intermittent stream, and two (2) as ephemeral streams. One feature is named on the USGS 7.5-minute Quadrangle Maps, Jwat1: Little Gum Creek.

Perennial streams identified in the project study area range from 8 to 18 feet in width with varying substrate combinations of gravel, sand, mud, and/or silt. The intermittent stream is approximately 10 feet wide with substrates primarily composed of silt, sand, and mud. Ephemeral streams range from 6 to 7 feet in width with a substrate of clay or sand. Gully and erosional features did not exhibit hydric soil or groundwater connections and consisted primarily of hillside or roadside swales, erosional channels, or relict agricultural ditches. Jacobs identified four (4) gully and erosional features during ecology field studies.

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.

GTC evaluated NWI, USGS, LiDAR data and field survey data, considering locations of waters of the United States in the project design. Although GTC will clear vegetation within forested wetland areas that are within the proposed transmission line ROW, thus converting them to non-forested, these areas will remain wetland resources. GTC also proposes to clear vegetation along the banks and within the State of Georgia's 25-foot stream buffers that fall within the proposed transmission line ROWs; however, GTC will have no effect to state stream buffers. GTC construction contractors will use clearing methods that will leave root systems intact and minimize land disturbance within these areas. A variety of methods and equipment can be utilized by the contractor to achieve this requirement. These can include hand clearing equipment, normal clearing machinery if conditions are dry at the time of clearing, load-distributing mats, and/or equipment with low ground pressure tracks and/or high-flotation tires with less than 10 PSI distributed load under full operating load.

GTC is currently developing construction plans, which include designs of vehicular wetland crossings needed for construction and future maintenance. GTC has identified numerous off-ROW access paths to minimize impacts to waters and wetlands along the proposed transmission line routes. GTC anticipates that any separate and complete crossing of waters of the United States would fall within less than a 0.5-acre of impact thresholds under the Section 404 Nationwide Permit Program. GTC is committed to developing plans and designs that minimize impacts to waters of the United States, therefore qualifying for use of the USACE's Nationwide Permit Program and avoiding a Section 404 Individual Permit.

GTC does not anticipate any transmission line structures will occur in any streams or wetlands. GTC will incorporate stringent Best Management Practices (BMPs) in the Erosion and Sedimentation Control (E&SC) plans and implement those to protect wetland resources.

5.3.3 Mitigation

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 not require a compensatory mitigation plan because there are no impacts to wetlands or streams.

5.4 ESA Listed Threatened and Endangered Species

Section 7 of the Endangered Species Act requires every Federal agency, including RUS, to consult with the USFWS to ensure that any action it authorizes is not likely to jeopardize the continued existence of any "listed species" (plants or animals listed as threatened or endangered) or result in the destruction or adverse modification of

designated critical habitat. The USFWS Interagency Cooperation regulations (50 CFR Part 402) require that the agency (RUS), or the applicant (GTC) on the Agency's behalf, requests the list of threatened and endangered species that may occur within the project's action area. GTC's consulting biologist makes this request on behalf of the applicant and the Agency.

For the purposes of better understanding the distribution of flora and fauna of the State, the Georgia legislature passed the Wildflower Preservation Act (Georgia Code Title 12 Chapter 6 Article 3) and the Endangered Wildlife Act of 1973. The GA DNR administers these two Acts. This program and the enabling acts have two purposes: to inventory the diverse flora and fauna of the state, and to protect "state endangered, threatened, rare, or unusual" species of plants and wildlife. Plants listed by the state are protected on public lands such as state or federal property, and on any other land that is not held by a private individual, firm, corporation, partnership, proprietorship, or other legal entity. For animals protected by the state, any activity that intends to harass, capture, kill, sell/purchase any part thereof, and/or destroys their habitats on public lands are prohibited

5.4.1 Affected Environment

The USFWS Information for Planning and Consultation (IPaC) website was queried to determine whether any federally listed species may be affected by the Lake Varner-Cornish Mountain transmission line project. The GA DNR Georgia Rare Species and Natural Community Data Portal website (georgiabiodiversity.org) was also queried for potential state-protected species occurrences within Newton County.

No suitable habitat was observed for any state or federally protected species within the Lake Varner-Cornish Mountain Project area; therefore, no species-specific surveys were required (see report in Appendix 9.4 and table below).

| Scientific Name | Common Name | Federal Status | State Status | Preferred Habitat | Effect Determination |
|-----------------------------|------------------------|----------------|--------------|--|----------------------|
| <i>Perimyotis subflavus</i> | Tricolored Bat | PE | N/A | Winter roosts are composed of caves, mines, cave like tunnels, trees, or roadway culverts. Summer roosts are mainly in dead or live tree foliage, but may also be in caves, mines, rock crevices, bridges, and culverts. This species also typically roosts within riparian areas. | NLTJ |
| <i>Amphianthus pusillus</i> | Little Amphianthus | T | E | Vernal pools on granite outcrops. | NE |
| <i>Danaus plexippus</i> | Monarch Butterfly | PT | N/A | May be encountered anywhere. Fields, development, roadsides, prairies (breeding). | NLTJ |
| <i>Rhus michauxii</i> | Michaux's Sumac | E | E | Dry, open, rocky, or sandy woodlands over mafic bedrock with high levels of calcium, magnesium, or iron; often on ridges and river bluffs. | NE |
| <i>Isoetes melanospora</i> | Black-spored Quillwort | E | E | Vernal pools on granite outcrops. | NE |

| Scientific Name | Common Name | Federal Status | State Status | Preferred Habitat | Effect Determination |
|---------------------------------|-----------------------|----------------|--------------|--|----------------------|
| <i>Isoetes tegetiformans</i> | Mat-Forming Quillwort | E | E | Vernal pools on granite outcrops. | NE |
| <i>Eriocaulon keornickianum</i> | Dwarf Pipewort | N/A | T | Granite outcrops | NE |
| <i>Sedum pusillum</i> | Puck's Orpine | N/A | E | Granite outcrops, often in mats of Hedwigia moss under <i>Juniperus virginiana</i> . | NE |
| <i>Haliaeetus leucocephalus</i> | Bald Eagle | N/A | T | Edges of lakes and large rivers; seacoasts. | NE |

E = Endangered, T = Threatened, PE = Proposed Endangered, PT = Proposed Threatened, N/A = Not Applicable, NLTJ = Not Likely to Jeopardize, NE = No Effect

As shown in the table above, the IPaC review identified six (6) federal species and three state species with a potential to occur within the project vicinity. 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.

5.4.2 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 protected species were observed during the ecological surveys; however, suitable habitats were observed for the tricolored bat and monarch butterfly. All survey reports can be found in the Appendix 9.4. The USFWS concurred with a finding of No Effect for the little amphianthus, black-spored quillwort, mat-forming quillwort, and Michaux's sumac in a letter dated February 19, 2026 (see Appendix 9.5).

Tri-Colored Bat (Federal, Proposed Threatened)

Due to the statewide range of the tricolored bat, mist netting or acoustic surveys were deemed unnecessary. As in most areas of the state, ample summer habitat exists throughout the Lake Varner-Cornish Mountain Project area. Although winter hibernacula such as caves and mines are not present, culverts and bridges that may be used in place of caves/mines occur in the surrounding area. The Lake Varner-Cornish Mountain Project is in the portion of the tricolored bat's range, referred to as "Zone 1- Year-round Active" by USFWS, where the species does not fully hibernate but instead, enters a torpor state during the winter months. Torpor is a type of temporary hibernation over the winter season where a species becomes lethargic during colder periods and may become active during warmer periods. Due to the high probability of this species being present in the survey area, the project is "not likely to jeopardize" the tricolored bat.

Monarch Butterfly (Federal Candidate Species)

Foraging habitat was observed throughout the project area for the Monarch Butterfly. Although foraging habitat is present for the Monarch Butterfly, milkweed was not observed within surveyed areas of the Lake Varner-Cornish Mountain Project. Milkweed is essential to the lifecycle of the Monarch Butterfly. Surveys were conducted during times when milkweed was observable. Due to the high probability of this species being present in the survey area, the project is “not likely to jeopardize” the monarch butterfly.

5.4.3 Mitigation

Per consultation with the USFWS dated February 19, 2026, the project is “not likely to jeopardize” the tri-colored bat or the monarch butterfly because of the limited footprint of the project relative to the range of the species. To the extent practicable, Georgia Transmission will follow recommended voluntary conservation measures as outlined in the attached consultation (see Appendix 9.5). However, because neither species is listed, no mitigation is required.

5.5 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.

Currently, GTC has an active Migratory Bird Special Purpose Utility (SPUT) permit through the USFWS. The Migratory Bird SPUT Permit requires GTC to submit an annual report to USFWS Region 4 Migratory Bird Office. This annual report summarizes and documents all known avian interactions on GTC’s facilities.

5.5.1 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. Migratory birds are likely located throughout the proposed project area and surrounding areas; therefore, the affected for the proposed project consists of the areas where there will be ground disturbance and/or vegetation removal.

5.5.2 Environmental Consequences

Georgia Transmission has designed the Project in a way that would meet or exceed the BMPs and measures outlined in the Avian and Power Line Interactions Committee’s (APLIC) Suggested Practices for Protection on Powerlines: The State-of-the-Art 2006 to reduce bird electrocutions and collisions (APLIC, 2006). In addition, GTC’s active Migratory Bird SPUT Permit with the USFWS authorizes utilities to collect, transport, and temporarily possess migratory birds found dead on utility property, structures, and ROWs, and allows GTC to better monitor avian mortality.

5.5.3 Mitigation

No mitigation is required.

5.6 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.”

5.6.1 Affected Environment

No occurrences, nests, or suitable foraging habitat was observed during the ecology surveys. Nearby Lake Varner provides foraging habitat for the Bald eagle. At its closest point, Lake Varner is approximately 0.9-miles from the project.

5.6.2 Environmental Consequences

The entire project corridor was traversed by Jacobs. 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.

5.6.3 Mitigation

No mitigation is required.

5.7 General Fish, Wildlife, and Vegetation Issues

5.7.1 Affected Environment

The ecology report developed by Jacobs characterizes the majority of the vegetation within the Lake Varner-Cornish Mountain Project as mixed pine-hardwood forest. Other land use types identified include maintained ROW, bottomland hardwood forest, old field, field, pasture, utility ROW, residential, substation, and planted pines. These areas are bisected by transportation corridors, various highways and county roads. These habitats are common across Newton County, GA. No trout streams exist within the project area.

5.7.2 Environmental Consequences

The construction of the proposed project will require approximately 24.66 acres of easement and/or fee simple property contains woody vegetation that requires clearing, much of this is roadside. 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 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 hazard trees (dead, diseased, or leaning trees) will be removed for the safe and reliable operation of the transmission line facilities.

The amount of land being converted is nominal and no adverse impacts to general land use or vegetational communities are anticipated.

5.7.3 Mitigation

No mitigation is required.

5.8 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 in 2024 by RUS and the Georgia State Historic Preservation Office (SHPO), and Georgia Transmission entitled *Programmatic Agreement Among the Rural Utilities Service and The Georgia State Historic Preservation Officer Concerning the Construction and Modification of Transmission Facilities by Georgia Transmission Corporation* (see Appendix 9.9).

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 site files and 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 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.

5.8.1 Archeological Resources

Historic properties listed in or eligible for listing in the NRHP include significant historic and prehistoric archaeological resources. To determine whether there are archaeological resources eligible for listing in the NRHP, Georgia Trans-mission has contracted with Jacobs Engineering to complete an Intensive Archeological Resources Surveys of the project footprint. In terms of archeology, the APE for the project consists of the easements required for the transmission line plus potential off ROW access roads. Although Georgia Transmission is not pursuing RUS funding for the Lake Varner substation, the construction footprint of the substation was also field surveyed.

5.8.1.1 Affected Environment

Prior to field surveys, Jacobs Engineering staff 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. Field surveys were also conducted. As a result, Jacobs revisited three previously recorded archaeological sites (9NE321, 9NE322, and 9NE323) and no new archaeological sites were identified within the APE for this project. Site 9NE321 was determined to be not eligible for listing on the NRHP under Criterion D. Sites 9NE322 and 9NE323 were recommended unknown under Criterion D with further testing recommended beyond the APE if work were to occur beyond the project footprint. As all three were determined to contain no significant features that would contribute to the eligibility of the sites, then no impacts are anticipated. Reports for archaeological surveys are provided in the attached Appendix 9.6 (redacted).

5.8.1.2 Environmental Consequences

Because no NRHP eligible sites – or potentially contributing portions of unevaluated sites – were identified within the APE of the project, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for archeological resources.

5.8.1.3 Mitigation

No mitigation is required.

5.8.2 Architectural History

Historic (above-ground) properties eligible for listing in the NRHP include significant buildings, structures, districts and objects, as well as significant archaeological sites. To determine whether there were historic resources eligible for listing in the NRHP within the area of potential effect, Georgia Transmission contracted with VHB. VHB surveyed the larger project study area of the project for historic resources in 2024 and later completed a Historic Resources Survey Report and Assessment of Effects Recommendation for the project in December 2025.

5.8.2.1 Affected Environment

During these surveys, VHB identified approximately 180 resources that appeared to be 50 years of age or older within a larger, initial project study area. 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.

In terms of historic properties, the APE for the proposed project consists of 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.

5.8.2.2 Environmental Consequences

Once the alignment was determined, VHB conducted an additional survey and determined that 46 of the previously documented resources were located within the area of potential effects (APE) of the project. VHB completed a Historic Resources Survey Report and Assessment of Effects Recommendation in December 2025. As a result of these efforts, project impact on resources within the APE were evaluated.

Of the identified resources, two (2) were recommended eligible for inclusion in the NRHP. VHB, in accordance with 36 CFR 800.5, the Criteria of Adverse Effect, has recommended that the proposed undertaking will result in a finding of no adverse effect to both of these resources (see assessment of effects in Appendix 9.7).

5.8.2.3 Mitigation

No mitigation is required.

5.8.3 Tribal Consultation

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 2/6/26 the following Indian tribes were notified of the recommended finding for the project: Alabama-Quassarte Tribal Town, Coushatta Tribe of Louisiana, and Seminole Tribe of Florida (see Appendix 9.8). To date, no tribes have responded to this correspondence.

5.9 Aesthetics

As development in suburban and 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.

5.9.1 Affected Environment

As documented previously, the proposed project is adjacent to lands that are administered by local governments at the Stone Road Softball Complex. These areas may be considered “Formally Classified Lands.”

5.9.2 Environmental Consequences

Stone Road Softball Complex

Georgia Transmission is proposing to locate approximately 0.7 of the 5.2 miles of the proposed transmission line in the vicinity of this public

recreational area. No project activities will be located on the park property, and no easements are required from the park. The proposed transmission line will be located on adjacent private property and will be largely shielded from view of the park by existing vegetation and agricultural fields. Therefore, the addition of the transmission line should not significantly alter the aesthetics of the park.

5.9.3 Mitigation

No mitigation is required.

5.10 Transportation

5.10.1 Roads

The proposed project crosses and/or parallels a series of local and state roads within Newton 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.

TABLE 8.0: List of Roads Crossed or Paralleled by Proposed Project

| | | | |
|---------------------|-------------|----------------|--------------------------------|
| Flat Rock Road | Devon Drive | Airport Road | John R Williams Highway/SR 142 |
| Old Georgetown Road | SR 81 | Gum Creek Road | Byrd Road |

5.10.2 Air Traffic

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 Covington Municipal Airport is located within the study area of the proposed project; therefore, Georgia Transmission will coordinate with the Federal Aviation Administration (FAA) and will follow all necessary conditions to ensure that the transmission line structures do not exceed obstruction standards and will not be a hazard to air navigation.

6. COORDINATION, CONSULTATION, AND CORRESPONDENCE

LOCAL/STATE

July 28, 2025 – Georgia Transmission notified elected officials of the proposed project providing a description, justification, and map of the route and informed them of an upcoming public information meeting.

September 8, 2025 – Georgia Transmission hosted a public information meeting at 2104 Washington Street in Covington, Georgia; approximately 25 people attended.

FEDERAL

August 25, 2025 – On behalf of Georgia Transmission, Jacobs Engineering, submitted requests to the USFWS IPaC website and to the WRD, Ga DNR for a list of protected species.

February 10, 2026 – 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

February 6, 2026 – RUS consulted with Tribes identified in TDAT as well as others believed to have an ancestral interest in Newton County. RUS provided a finding letter and provided a 30-day comment period. No comments have been received to date.

7. REFERENCES

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9. APPENDICES

- 9.1 Report Figures
- 9.2 Project Release Documents
- 9.3 Ecological Survey Report
- 9.4 USFWS, Agency Correspondence
- 9.5 Phase I, Archeology Survey (REDACTED)
- 9.6 Historic Resources Survey and Assessment of Effects Recommendation
- 9.7 Tribal Consultation (REDACTED)
- 9.8 Programmatic Agreement