



Department of Energy

Washington, DC 20585

May 27, 2026

Christopher Nunn
State Historic Preservation Officer and Commissioner
Georgia Department of Community Affairs
Attn: Environmental Review, Historic Preservation Division
60 Executive Park South, NE
Atlanta, Georgia 30329

cc:

Jennifer Flood, Division Director
Deputy State Historic Preservation Officer

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Georgia Power Company, South Hall Battery Energy Storage System Project, Hall County, Georgia

Dear Mr. Nunn,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Georgia Power Company (GPC, or the Applicant) for the South Hall Battery Energy Storage System (BESS) Project (the Project) located in Hall County, Georgia.

The purpose of this letter is to formally initiate consultation with the Georgia State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents a description of the undertaking, the Area of Potential Effects (APE), the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

A map of the Project is included as Attachment 1, a cultural resources report is included as Attachment 2, and a Georgia Historic Preservation Division (HPD) Environmental Review Form is included as Attachment 3.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which includes five primary elements:

- 1) BESS facility,
- 2) Generation Step-Up (GSU) substation,
- 3) New approximately 1,500-foot-long 230 kV transmission tie-line,
- 4) Clermont Junction - South Hall transmission line relocation, and
- 5) Abandonment of 0.37 mile of Clermont Junction – South Hall transmission line.

The Project will involve construction and installation of shop-fabricated battery enclosures (standing less than 10 feet tall), inverter step-up transformers, auxiliary power system, BESS control system, private fire main, security system, and external fire alarm system. An Operations and Maintenance (O&M) building and permanent parking lot will be constructed on the northeast side of the BESS modules. The O&M building will house operation and maintenance staff, contain the control system and operator station, and store all spare parts and maintenance equipment for the BESS facility. A gravel laydown yard and parking lot will be installed directly east of the BESS modules.

The BESS will connect to a GSU substation located on the northwest side of the Project site. Connection will be via 34.5 kV underground lines. The GSU substation will transform the generating voltage to 230 kV so it can be conveyed to the existing South Hall 230/500 kV substation via a new 230 kV interconnecting tie-line, approximately 1,500 feet long. The utility line structures for this new line will be same approximate height as those of the existing lines entering the substation (e.g., approximately 80-90 feet tall). To accommodate the tie-line, the Clermont Junction – South Hall 230 kV transmission line will be relocated from its tie-in on the north side of the substation to the south side of the substation. This change involves removal of two structures on the existing line (the northwest-southeast oriented portion shown in Attachment 1) and construction of two new structures of the same height (approximately 90-feet tall) on the relocated segment (the east-west oriented portion shown in Attachment 1). The South Hall 230/500 kV substation is connected to the grid via this line and several other existing 230 kV and 500 kV transmission lines.

The Project is located within two adjacent GPC-owned parcels and will require ground disturbance of approximately 35.8 acres within these parcels. Of the area to be disturbed, 31.3 acres will be used for the BESS site, which includes the battery modules, GSU substation, O&M building, parking area, access road, water line, stormwater pond, and laydown yard; and about 4.5 acres will be used for the 230 kV interconnecting tie-line and relocation (removal and reconstruction) of the Clermont Junction - South Hall 230 kV transmission line segment. No ground disturbance is expected in the existing South Hall 230 kV Substation.

A map of the Project is included as Attachment 1, and additional maps are provided in the cultural resources report that is included as Attachment 2.

Degree of Federal Involvement

The BESS facility and the GSU substation would be partially funded by the EDF loan, whereas the new transmission line (tie-line), the Clermont Junction-South Hall transmission line relocation, and the abandonment of 0.37 mile of the Clermont Junction-

South Hall transmission line would be fully funded. For the fully funded Project components, all construction and purchase/installation of Project materials would be covered by the EDF loan. The eligible portions of the BESS facility and GSU substation are described below.

The purchase of components, installation/assembly, associated design, engineering, programming, testing, commissioning and labor that are covered by EDF funding include the BESS modules, medium voltage inverter transformers for the modules, O&M building, storage building for spare parts, above-ground security and fire protection components (cameras, alarms, sensors, associated piping/wiring/cables, etc.), perimeter fencing (but not fence poles/posts), the GSU substation physical equipment (transformers, regulators, breakers, bus bars, etc.), framework, and substation fencing (except for poles placed in the ground).

The following activities associated with preparing the BESS and GSU substation site will **not** be subject to EDF funding: tree clearing, stump grubbing, erosion & sediment control measures, grading, stormwater drainage system, parking lot, laydown yard, perimeter fence poles/posts, underground wiring/lines/conduit and equipment foundations/slabs. GPC has already initiated and/or completed these activities (using their own funds), and therefore, they are not eligible for funding under the EDF loan program; as such, there is no federal action for these activities. However, the geographic areas for the activities that will not be subject to EDF funding are still included in the APE for the undertaking, and are covered by the pre-construction cultural resource surveys, as described below and presented in Attachment 2.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE EDF distinguishes different survey areas for identifying archaeological and historic architectural resources (hereafter, the “archaeological survey area” and “architectural survey area”). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project’s archaeological survey area includes the 35.8-acre Project LOD. The Project’s architectural survey area includes the Project LOD and the area within a 0.25-mile radius of the parcel boundary.

The cultural resources report included as Attachment 2 provides maps of the area surveyed. DOE EDF notes that a broader area was surveyed for archaeological resources totaling 81.7 acres (an initial survey of 78.2 acres, and an addendum survey of 3.5 acres) within which the 35.8-acre Project LOD will be located.

DOE EDF also acknowledges that Attachment 2 refers to the archaeological survey area as the “Direct APE” and the architectural survey area as the “Visual APE”, and notes that in accordance with the 2019 D.C. Circuit Court decision in *National Parks Conservation Association v. Semonite*, visual effects that are caused by the undertaking are considered direct effects.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following twelve (12) federally recognized Tribes to see if they have an interest in the Project: Alabama-Quassarte Tribal Town; Cherokee Nation; Coushatta Tribe of Louisiana; Eastern Band of Cherokee Indians; Kialegee Tribal Town; Miccosukee Tribe of Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Tribe of Florida; Seminole Nation of Oklahoma; Thlopthlocco Tribal Town; and United Keetoowah Band of Cherokee Indians in Oklahoma.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is necessary or requested.

Records Search

As part of the Section 106 process, the Applicant contracted Edwards-Pitman, Inc. (EP) to conduct cultural resource identification surveys. EP prepared the cultural resources report that is included as Attachment 2 and summarized below.

Prior to fieldwork, EP searched Georgia’s Natural, Archaeological, and Historical Resources Geographic Information System (GNAHRGIS) online database, Georgia’s Historic Bridge Survey, the National Register of Historic Places (NRHP), and Georgia’s Railroads, 1833-2015: Historic Context and Statewide Survey to identify previously conducted surveys and previously recorded resources located within a 1-kilometer (0.62 mile) radius surrounding the Project. This background research identified two (2) previous archaeological surveys that partially overlap the current APE and three (3) previously recorded archaeological sites within the search radius, none of which are located within the

current Project's archaeological survey area. No NRHP-listed properties or GNAHRGIS historic architectural resources were identified within the 1-kilometer search radius. An eligible historic railroad (the Gainesville Midland Railway) is located between 0.6 and 1 kilometer (0.35 and 0.62 mile) to the east of the Project; however, this resource is not located within the Project APE. Additional archival sources and databases that were consulted prior to fieldwork that did not identify any previously recorded resources in the APE or a 1-kilometer search radius include the National Historic Landmarks database, American Battlefield Protection Program's (ABPP) Civil War Sites Advisory Commission (CWSAC), ABPP Revolutionary War and War of 1812 sites, Find-a-Grave, historic transportation corridor sources (e.g. Historic Bridges, Historic Railroads, Historic Roads), historic maps (e.g., topographic maps and soil maps), aerial photographs (historic, modern, and street view), tax assessor records, and Georgia historic contexts.

Following the completion of background research, EP completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic aboveground resources within the APE. The results of the surveys are provided in Attachment 2 and summarized below.

Archaeological Resources

The archaeological field survey consisted of pedestrian walkover of the archaeological survey area employing visual inspection of the ground surface and subsurface testing at 30-meter intervals where conditions allowed. If investigators encountered any disturbances that prevented shovel test excavation, they attempted to offset the test to a maximum of 5 meters (16.4 feet) while maintaining the pre-plotted 30-meter testing interval. Any disturbances that prevented shovel test excavation were recorded as "No Dig" and were documented in the field notes and photo-documented by the investigators. The initial survey encompassed an area of 78.2 acres, and the addendum survey included 3.5 acres partially overlapping and adjacent to an existing GPC substation. A total of 384 shovel tests were planned for the initial survey, with 369 tests excavated and 15 classified as "No Dig" locations. The addendum survey included 22 excavated shovel tests and seven (7) "No Dig" locations. None of the shovel tests recovered cultural material, and no surface features were encountered during the surveys. Thus, no archaeological resources were identified within the APE. Additional details and maps are provided in Attachment 2.

Historic Architectural Resources

The historic architectural survey included a windshield and/or pedestrian survey from the public right-of-way of any buildings or structures within the architectural survey area that are 50 years of age or older. Any architectural resources 50 years of age or older located within the direct line of sight to the Project were photographically documented and recorded on Project maps. Per Attachment 2, the 0.25-mile "visual APE" radius was applied to both the initial and addendum survey areas and architectural survey was conducted within that area for both the initial and addendum field survey efforts. One (1) historic architectural resource was identified: a poultry processing plant located at 2320 Webb Girth Road, Gainesville, Georgia, designated in Attachment 2 as "Resource 1." As

the resource is not associated with significant historical events, trends, or persons, nor is it an example of a unique architectural form or function, this resource was recommended as not eligible for listing in the NRHP. Thus, no historic properties were identified within the APE. Additional details and maps are provided in Attachment 2.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Georgia SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter.**

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

Molly R. Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Map of the Project

Attachment 2. Cultural Resources Report

Attachment 3. Georgia SHPO Project Review and Consultation Form