



Department of Energy

Washington, DC 20585

May 26, 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, Wadley Battery Energy Storage System Project, Jefferson 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 Wadley Battery Energy Storage System (BESS) Project (the Project) located in Jefferson 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 the undertaking's effects on historic properties; and seeks your concurrence with DOE's Finding of No Adverse Effect for this Project.

A Project map 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 the construction and operation of a 260-

megawatt (MW) / 4-hour (e.g., 1,040 MWh) electrochemical BESS with a new overhead 230 kilovolt (kV) utility line and breaker station. The line will connect the BESS to a new electrical breaker station, which will tie-into an existing generating facility's step-up substation. That substation currently connects to GPC's Rachels Pond 230 kV Switching Station.

The Project will include the construction and installation of shop-fabricated battery enclosures, inverter step-up transformers, auxiliary power system, site building, power plant control system, 50,000-gallon water tank, security system, and external fire alarm system. Following construction, the area will be restored and stabilized in accordance with the Project's Erosion, Sedimentation and Pollution Control Plan (ES&PCP) and the Georgia Manual for Erosion and Sediment Control. The Project substation area scope includes rough grading only.

The Project BESS site is located at 1890 Coleman Chapel Road in Wadley, Georgia. It is approximately 2 miles southwest of Wadley and 1.6 miles west of U.S. Highway 1. The existing condition of the site is best characterized as a rural area, mostly agricultural with limited forested areas, adjacent to an existing electric generating facility that is not owned and operated by GPC. A Project map is included as Attachment 1. Additional maps of the areas surveyed for the Project are provided in the cultural resources report that is included as Attachment 2.

Degree of Federal Involvement

The Project would be partially funded by the EDF loan. The eligible portions of the Project include the purchase of components and installation/assembly of the BESS modules atop existing foundations. Project site preparation and related construction activities will **not** be subject to EDF funding (e.g., 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, and 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 and covered by the pre-construction cultural resource surveys completed by the Applicant, as described below.

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 53.9-acre LOD that includes the BESS site and easements for the interconnection tie-line and the breaker substation. The Project's architectural survey area includes the LOD and the area within a 0.25-mile radius of the Project.

The cultural resources report included as Attachment 2 provides maps of the areas surveyed. DOE EDF notes that a much broader area was surveyed to identify archaeological and historic resources totaling 301 acres within which the current 53.9-acre Project LOD will be located.

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 ten (10) federally recognized Tribes to see if they have an interest in the Project: Alabama-Quassarte Tribal Town; Coushatta Tribe of Louisiana; 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 NV5 Engineers and Consultants, Inc. (NV5) to conduct cultural resource identification surveys. NV5 prepared the cultural resources report that is included as Attachment 2 and summarized below.

Prior to fieldwork, NV5 searched Georgia's Natural, Archaeological, and Historical Resources Geographic Information System (GNAHRGIS) online database, the National Register of Historic Places (NRHP) database, and other archival sources to identify previously conducted surveys and previously recorded resources located within a 1-mile

radius surrounding the Project. This background research identified four (4) previous surveys within 1 mile of the Project, none of which overlap the current APE. Six (6) previously recorded archaeological sites are located within the 1-mile search radius, none of which are within the current Project's archaeological survey area portion of the APE. No NRHP-listed properties or GNAHRGIS previously recorded historic architectural resources were identified within the architectural survey area portion of the APE.

Following the completion of background research, NV5 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. Again, DOE EDF notes that Attachment 2 includes survey coverage of a much broader area totaling 301 acres within which the current 53.9-acre Project LOD will be located.

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. A total of 852 shovel test locations were plotted across the surveyed area, 674 of which were excavated. Of the excavated shovel tests, three (3) were positive for cultural material. Plotted test locations which were unable to be excavated included 54 wet/inundated points, 92 disturbed points (existing solar farm), 28 disturbed (surface inspection), two for (2) subsurface utilities, and two (2) within a cemetery (see Attachment 2, Figure 5.4).

Two archaeological sites and three isolated finds were identified during the survey. The isolated finds are considered not eligible for the NRHP. The two recorded sites are historic-age cemeteries affiliated with the Live Oak Church and the Coleman Chapel United Methodist Church, both of which are considered not eligible for the NRHP under Criterion D for archaeological data/research potential. Furthermore, both cemeteries are located outside of the Project LOD and will be avoided entirely by Project construction activity (see Attachment 1). Therefore, no archaeological historic properties were identified within the APE.

Historic Architectural Resources

The historic architectural survey included a windshield and/or pedestrian survey from the public right-of-way. Any architectural resources 50 years of age or older located within the APE were photographically documented and recorded on Project maps. A total of seven (7) historic architectural resources were identified, two (2) of which are recommended eligible for inclusion in the NRHP and five (5) of which are recommended as not eligible for the NRHP. Additional details and maps are provided in Attachment 2.

The eligible historic architectural resources include the circa (ca.) 1871 Coleman Chapel United Methodist Church and Cemetery, designated as "Resource 2" in Attachment 2, and a historic farm with ca. 1880 primary residence (Georgian Wing Cottage) and two ca. 1900

tenant houses, designated as “Resource 6” in Attachment 2. Brief descriptions of these historic properties and the undertaking’s effects on them are provided below.

Description of the Undertaking’s Effects on Historic Properties

Resource 2 (Coleman Chapel United Methodist Church and Cemetery): this church property and congregation are not known to have played a historically significant role in the religious history of Jefferson County or the region, or to have been affiliated with significant historical persons or figures. The church building has been extensively altered through a breezeway addition and application of non-historic materials such as vinyl siding and replacement front doors. Therefore, the church building is not eligible for the NRHP under Criteria A, B, or C. However, the cemetery is a good and intact example of a rural late-nineteenth century through twentieth-century church cemetery with examples of period funerary monuments. Therefore, **the cemetery is eligible for the NRHP under Criterion C and Criteria Consideration D** (as a cemetery which derives its primary significance from distinctive design features).

The proposed BESS facility would be located approximately 3,500 feet (0.65 miles) away from the property (i.e., the property is technically outside of the 0.25-mile viewshed APE of the BESS). The property is only approximately 450 feet from the transmission tie-line, but the transmission tie-line would be visually obscured from the resource due to interceding vegetation (e.g., dense woodlands surrounding the border of the church property). Therefore, the undertaking would not be visible from the property or alter the property’s setting, and there would be **no effect** on this historic property.

Resource 6 (1384/1703 Coleman Chapel Road): this historic property features three (3) houses on the same parcel including the primary residence (House A), a ca. 1880 Gabled Wing Cottage, House B, a ca. 1900 Central Hall Cottage, and House C, which appears to be a smaller Gabled Wing Cottage but is vacant and heavily obscured by overgrown vegetation. The farm retains intact cultivated fields, a largely unaltered ca. 1880 farmhouse, and one intact circa 1900 tenant house. As a whole, these elements constitute a good and intact example of a late-nineteenth to early-twentieth century farm, and the property has retained its character-defining features and its intact internal historic setting; therefore, the **parcel is eligible under NRHP Criterion A** for its association with historic agriculture.

Individually, House A is a good and intact example of a late-nineteenth-century Gabled Wing Cottage. The structure has retained its historic Gabled Wing Cottage form and integrity of historic materials and workmanship including siding, windows, and front entry. Therefore, **House A is eligible under NRHP Criterion C**. In contrast, House B has undergone multiple non-historic material and design alterations, and House C is in partly ruinous condition due to structural deterioration over time. These two structures lack integrity and are considered not eligible for the NRHP.

The proposed BESS facility would be located approximately 0.9 miles away from House A and the proposed transmission line tie-line would be located over 0.5 miles away from House A (i.e., the individually eligible structure on the property is technically outside of

the 0.25-mile APE). The Project would not be visible from the House A and would have **no effect** on its architectural significance. The Project could potentially be visible from certain areas of the property's historic agricultural fields; however, the majority of views from the parcel toward the Project to the west and southwest are obscured by interceding vegetation (e.g., tree lines separating parcels). The external historic setting of the property has been previously altered by the installation of commercial-scale solar generating facilities on adjacent parcels to the south; therefore, the Project is not a novel alteration to the external setting of the historic property. Furthermore, the Project will not alter the property's cultivated fields, preserving the ability for the property's internal setting to convey its agricultural significance. Thus, the proposed undertaking would have **no adverse effect** on this historic property.

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 Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Georgia SHPO on the Finding of No Adverse Effect, 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. Project Map

Attachment 2. Cultural Resources Report

Attachment 3. Georgia SHPO Project Review and Consultation Form