



Department of Energy

Washington, DC 20585

September 29, 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, Wansley Units 10 and 11 Combined Cycle Project, Heard County, Georgia

Dear Mr. Nunn,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with Georgia Power Company (GPC or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to GPC is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. GPC has identified the Wansley Units 10 and 11 Combined Cycle (CC) Project (the Project) located in Heard County, Georgia, for potential inclusion in the loan guarantee.

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), and the efforts to identify historic properties; and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

Cultural resource reports are included as Attachments 1 and 2, and a Georgia Historic Preservation Division (HPD) Environmental Review Form is included as Attachment 3.

Description of the Undertaking

DOE's proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which involves the construction and operation of a steam electric (thermal) generating facility in Heard County, Georgia. The Plant Wansley Units 10 and 11 CCs will be located at 1371 Liberty Church Road approximately 3.4 miles south of SR-5 and northwest of the Chattahoochee River. The Project is located in an area that previously served as coal storage and handling for the former Plant Wansley coal-fired units. All coal and material handling infrastructure was previously removed as part of the decommissioning activities for the former units. The Project's limits of disturbance (LOD) includes approximately 105 acres proposed to be developed and ultimately occupied by Project infrastructure; the LOD also includes temporary laydown areas, temporary construction workspace, and permanent access roads.

Each CC unit will consist of a multi-shaft combined cycle unit comprised of one dual fuel combustion turbine generator, one supplementary fired heat recovery steam generator, one condensing reheat steam turbine and all balance of plant equipment necessary to form a fully functional and operational CC unit. Project elements included in the balance of plant equipment include the closed cycle cooling towers, cooling water makeup supply piping from the existing Plant Wansley Service Water Pond, two (2) Fire Water tanks (each unit has one tank and they are cross-tied to provide a secondary source), municipal water supply, fuel oil tanks, fuel oil unloading area, an oil water separator, and carbon dioxide and hydrogen bulk storage areas. A dedicated 500 kilovolt (kV) collector yard is provided for each unit, which contains the generation step-up transformers and related electrical equipment. The collector yards will connect to the existing Plant Wansley 500 kV Switchyard via 500 kV tie-lines to be built as part of the Project. These tie-lines will traverse the previously disturbed area formerly occupied by the Plant's coal-fired units, which have been demolished. The Project also includes common administration, fire pump and water treatment plant buildings. There are also tie-ins to connect the roads, storm water, wastewater, natural gas, raw water and potable water to the existing systems at the site. Project maps are provided in the cultural resource reports included as Attachments 1 and 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 105-acre Project LOD that includes the Project CC site and all related Project infrastructure as described above, as well as temporary laydown areas and workspace, and permanent access roads. The Project's architectural survey area includes the LOD and the area within a 0.25-mile radius of the Project.

The cultural resource reports included as Attachments 1 and 2 provide maps of the area surveyed. DOE EDF notes that broader 143.5-acre area was surveyed within which the 105-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 eleven (11) federally recognized Tribes to see if they have an interest in the Project: Alabama-Coushatta Tribe of Texas, 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 State Historic Preservation Office (SHPO) and other consulting parties, as appropriate, if additional consultation is necessary or requested.

Records Search

As part of the Section 106 process, the Borrower contracted Edwards-Pitman, Inc. (EP) to conduct cultural resource identification surveys. EP prepared the cultural resource reports that are summarized below and included as Attachments 1 and 2.

Prior to fieldwork, EP 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-kilometer radius surrounding the Project. This background research found no previous surveys within the study area. Four (4) previously recorded archaeological sites are located

within the study area, none of which are within the current Project's archaeological survey area portion of the APE. One (1) historic American Indian Trail, the Oakfuskee Trail, was identified within the study area, but this trail does not intersect the Project APE. Three (3) historic cemeteries were identified and delineated (see Attachment 1); however, the areas where these cemeteries were surveyed are not within the 105-acre Project LOD. No NRHP-listed properties, National Historic Landmarks, historic bridges, historic railroads, or GNAHRGIS previously recorded historic architectural resources were identified within the architectural survey area portion of the APE.

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 summarized below and provided in Attachments 1 and 2. Again, DOE EDF notes that these field surveys include coverage of a broader area totaling 143.5 acres within which the current 105-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 systematic subsurface shovel testing where conditions allowed. Supplemental subsurface probing and ground-penetrating radar (GPR) survey was conducted in the vicinity of identified cemeteries (see Attachment 1). A total of 337 shovel test locations were plotted across the surveyed area in 30-meter intervals, 152 of which were excavated and were negative for cultural material; the remaining 185 could not be excavated due to various field conditions such as proximity to railroad, presence of buried utilities, excessive slope, or disturbed areas within the existing Plant Wansley facility. Photographic documentation of the environs and disposition of the survey area are provided in Attachments 1 and 2. All shovel tests were negative for cultural material, no intact subsurface strata or archaeological deposits were identified through shovel testing.

As reported in Attachment 1, four (4) historic cemeteries (9HE244, -245, -246, and -247) were identified within the survey area and investigated with GPR. While Attachment 1 concludes that the NRHP status of these resources should remain Unevaluated pending further research or investigations and recommends archaeological monitoring in areas within a 50-foot radius of each cemetery during Project construction. However, the refined Project LOD depicted in the addendum survey report (Attachment 2) indicates that the Project would avoid all four cemeteries entirely. Therefore, none of the four cemeteries are within the Project APE.

Historic Architectural Resources

The historic architectural survey included a windshield and/or pedestrian survey from the public right-of-way and GPC-owned right-of-way within and near the Project. Any architectural resources 50 years of age or older located within the APE were photographically documented and recorded on Project maps. Two (2) historic architectural

resources were identified. The first is a ca. 1975 GPC electrical plant that is mostly non-historic, and the remaining historic-age features do not retain their spatial relationships due to intervening modern additions and structures, nor do they represent significant architectural types or styles. The second resource is a ca. 1880s front-gabled church that has suffered a loss of integrity as represented by non-historic flagstone foundation piers, vinyl windows, front and side porches, doors, and roofing. Both historic resources are considered not eligible for the NRHP. Additional details and maps are provided in Attachment 1.

In conclusion, no historic properties are present within the APE.

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 202-586-8716 or via email at EDF_Environmental@doe.gov.

Sincerely,

KARA HARRIS Digitally signed by KARA HARRIS
Date: 2026.09.29 13:42:16 -04'00'

Kara J. Harris
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

- Attachment 1. Cultural Resources Report
- Attachment 2. Addendum Cultural Resources Report
- Attachment 3. Georgia SHPO Project Review and Consultation Form