

APPENDIX B – FEMA AND NWI MAPS

National Flood Hazard Layer FIRMeTte



82°51'58"W 33°7'22"N



82°51'20"W 33°6'52"N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		Cross Sections with 1% Annual Chance Water Surface Elevation
MAP PANELS		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **3/3/2023 at 1:05 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



March 8, 2023

Wetlands

- | | | |
|--|---|---|
|  Estuarine and Marine Deepwater |  Freshwater Emergent Wetland |  Lake |
|  Estuarine and Marine Wetland |  Freshwater Forested/Shrub Wetland |  Other |
|  Freshwater Pond |  Riverine | |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

APPENDIX C – USFWS IPAC REPORT AND STATE PROTECTED SPECIES



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601-2523
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To:

May 23, 2023

Project Code: 2023-0084973

Project Name: Burns & McDonnell - Oglethorpe Power Company - Dual Fuel Conversion Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Thank you for your request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), Fish and Wildlife Coordination Act (FWCA) (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency, project proponent, or their designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally listed threatened or endangered fish or wildlife species without the appropriate permit. If you need additional information to assist in your effect determination, please contact the Service.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's [Section 7 Consultation Library](#) and [Habitat Conservation Plans Library](#) Collections.

Action Area. The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications or impacts to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. An updated list may be requested through IPaC.

How to Submit a Project Review Package. If you determine that your action may affect any federally listed species and would like technical assistance from our office, please send us a complete project review package. A step by step guide is available at the Georgia Ecological Services [Project Planning and Review](https://www.fws.gov/office/georgia-ecological-services/project-planning-review) page (<https://www.fws.gov/office/georgia-ecological-services/project-planning-review>).

Beginning April 1, 2023, requests for threatened and endangered species project reviews must be submitted to our office using the process described below. (If you are not emailing us to submit a project for review, your email will be forwarded to the appropriate staff.) This is a three-step process. All steps must be completed to ensure your project is reviewed by a biologist in our office and you receive a timely response. In brief the steps are:

Step 1. Request an official species list for your project through IPaC (Done!)

Step 2. Complete applicable Determination Keys

Step 3. Send your complete project review package to GAES_Assistance@FWS.gov for review if no dKey is applicable or all aspects of the project are not addressed by dKeys, i.e. a species returned by IPaC does not have a dKey to address impacts to it. A complete project review package should include:

1. A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. The description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, such as the purpose of the action; duration and timing of the action; location (latitude and longitude); specific activities involving disturbance to land, water, and air, and how they will be carried out; current description of areas to be affected directly or indirectly by the action; and maps, drawings, or similar schematics of the action.
2. An updated Official Species List and dKey results
3. Biological Assessments (may include habitat assessments and information on the presence of listed species in the action area);
4. Description of effects of the action on species in the action area and, if relevant, effect determinations for species and critical habitat;
5. Conservation measures and any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (e.g., management plans related to stormwater, vegetation, erosion and sediment plans). Visit the [Georgia Conservation Planning Toolbox](https://www.fws.gov/story/conservation-tools-georgia) (<https://www.fws.gov/story/conservation-tools-georgia>) for information about conservation measures.
6. In the email subject line, use the following format to include the Project Code from your IPaC species list and the county in which the project is located (Example: Project Code: 2023-0049730 Gwinnett Co.). For Georgia Department of Transportation related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

The Georgia Ecological Services Field Office will send a response email within approximately 30 days of receipt with technical assistance or further recommendations for specific species.

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value. We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's [NWI program website](https://www.fws.gov/program/national-wetlands-inventory) (https://www.fws.gov/program/national-wetlands-inventory) integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's [Migratory Birds Program](https://fws.gov/program/migratory-birds) (https://fws.gov/program/migratory-birds). To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction. It can be found at the Service's [Migratory Birds Conservation Library Collection](https://fws.gov/library/collections/migratory-bird-conservation-documents) (https://fws.gov/library/collections/migratory-bird-conservation-documents).

Information related to best practices and migratory birds can be found at the Service's [Avoiding and Minimizing Incidental Take of Migratory Birds Library Collection](https://fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds) (https://fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds).

BALD AND GOLDEN EAGLES

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to “disturb” eagles. Under the BGEPA, the Service may issue limited permits to incidentally “take” eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at the Service's [Bald and Golden Eagle Management Library Collection](https://fws.gov/library/collections/bald-and-golden-eagle-management) (https://fws.gov/library/collections/bald-and-golden-eagle-management).

NATIVE BATS

If your species list includes Indiana bat (*Myotis sodalis*) or northern long-eared bat (*M. septentrionalis*) and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing should occur outside of the period when bats may be present. Federally listed bats could be actively present in forested landscapes from April

1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time.

Indiana, northern long-eared, and gray (*M. grisescens*) bats are all known to utilize bridges and culverts in Georgia. If your project includes maintenance, construction, or any other modification or demolition to transportation structures, a qualified individual should complete a survey of these structures for bats and submit your findings via the Georgia Bats in Bridges cell phone application, free on Apple and Android devices. Please include these findings in any biological assessment(s) or other documentation that is submitted to our office for technical assistance or consultation.

Additional information can be found at Georgia Ecological Services' [Conservation Planning Toolbox](#) and [Bat Conservation in Georgia](#) pages.

MONARCH BUTTERFLY

On December 20, 2020, the Service determined that listing the Monarch butterfly (*Danaus plexippus*) under the Endangered Species Act is warranted but precluded at this time by higher priority listing actions. With this finding, the monarch butterfly becomes a candidate for listing. The Service will review its status each year until we are able to begin developing a proposal to list the monarch.

As it is a candidate for listing, the Service welcomes conservation measures for this species. Recommended, and voluntary, conservation measures for projects in Georgia can be found at our [Monarch Conservation in Georgia](https://www.fws.gov/project/monarch-conservation-georgia) (https://www.fws.gov/project/monarch-conservation-georgia) page.

EASTERN INDIGO SNAKE

The [Standard Protection Measures for the Eastern Indigo Snake](#) (*Drymarchon couperi*) include educational materials and training that can help protect the species by making staff working on a project site aware of their presence and traits. In Georgia, indigo snakes are closely associated with the state-listed gopher tortoise (*Gopherus polyphemus*), a reptile that excavates extensive underground burrows that provide the snake shelter from winter cold and summer desiccation.

SOLAR ENERGY DEVELOPMENT

The Georgia Low Impact Solar Siting Tool (LISST) is available as a map layer in IPaC (Find it in the “Layers” Box > “Environmental Data”) and as a [web application](#) to provide project managers with the data to identify areas that may be preferred for low impact development. The tool seeks to support the acceleration of large-scale solar development in areas with less impact to the environment.

STATE AGENCY COORDINATION

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (https://georgiawildlife.com/WildlifeActionPlan), at Georgia Department of Natural Resources, Wildlife Resources Division Biodiversity Portal (https://georgiawildlife.com/conservation/species-of-concern), Georgia's Natural, Archaeological, and

Historic Resources GIS portal (<https://www.gnahrgis.org/gnahrgis/index.do>), and the [Georgia Ecological Services HUC10 Watershed Guidance](#) page.

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email gaes_assistance@fws.gov and reference the project county and your Service Project Tracking Number.

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

Attachment(s):

- Official Species List
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Georgia Ecological Services Field Office

355 East Hancock Avenue

Room 320

Athens, GA 30601-2523

(706) 613-9493

PROJECT SUMMARY

Project Code: 2023-0084973

Project Name: Burns & McDonnell - Oglethorpe Power Company - Dual Fuel Conversion Project

Project Type: Power Gen - Natural Gas

Project Description: Oglethorpe Power Company's proposed Dual Fuel Conversion Project (Project) would occur at the existing Washington County Energy Facility (Facility), and includes converting two existing simple-cycle natural gas combustion turbines (CTs) into dual fuel capable CTs. All mechanical and software upgrades involved in the Project would occur within the existing Facility footprint. It is not anticipated that the proposed Project would have any impact to natural resources.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.09410325,-82.98192277338808,14z>



Counties: Washington County, Georgia

ENDANGERED SPECIES ACT SPECIES

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Brown-headed Nuthatch <i>Sitta pusilla</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 15
Eastern Whip-poor-will <i>Antrostomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10

NAME	BREEDING SEASON
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

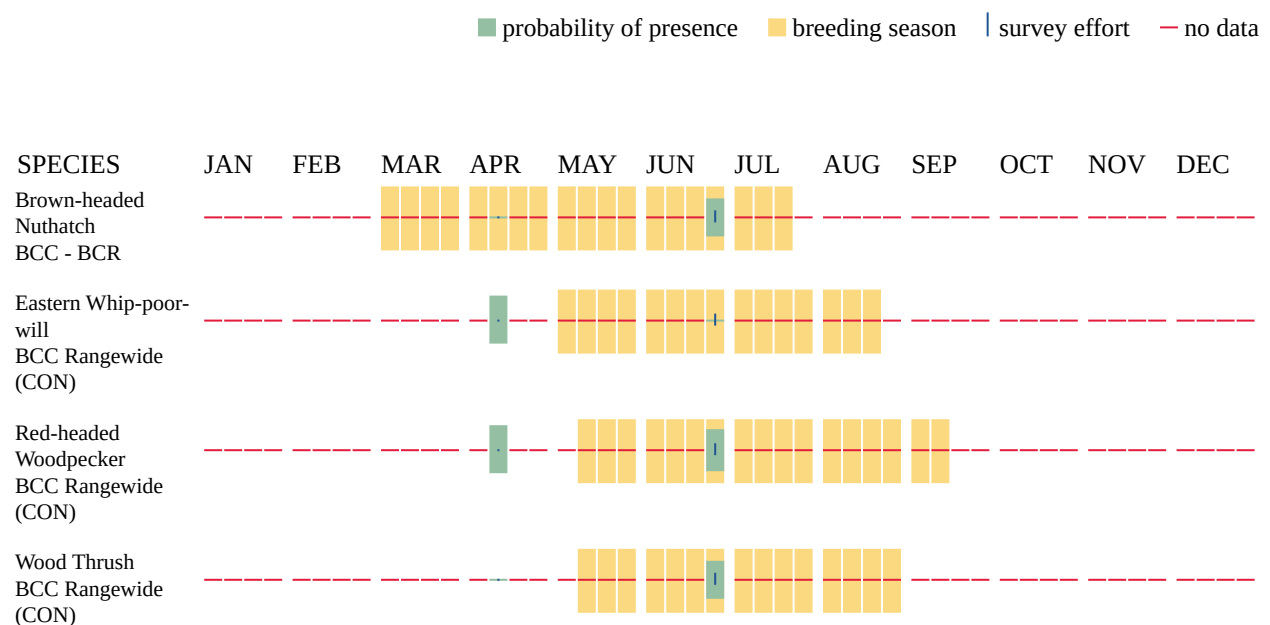
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#)

may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
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2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER EMERGENT WETLAND

- [PEM1C](#)
- [PEM1A](#)

FRESHWATER FORESTED/SHRUB WETLAND

- [PFO1A](#)

RIVERINE

- [R4SBC](#)
-

IPAC USER CONTACT INFORMATION

Agency: Burns & McDonnell
Name: Madeline Long
Address: 4004 Summit Blvd NE
Address Line 2: Suite 1200
City: Atlanta
State: GA
Zip: 30319
Email: mrlong@burnsmcd.com
Phone: 6788953532

Scientific Name	Common Name	GA Prot	US Prot	GRank	Rnd GRank	SRank	Rnd SRank	SwapStatus	ES_ID	Element Code	Group	Georgia Habitat Summary	EO Count	Export Date
<i>Stewartia malacodendron</i>	Silky Camellia	R	null	G4	G4	S2	S2	Yes	19740	POTH06010	Plant	Along streams on lower slopes of beech-magnolia or beech-basswood-Florida maple forests	42	February 3, 2023
<i>Waldsteinia lobata</i>	Piedmont Barren Strawberry	R	null	G3	G3	S2	S2	Yes	21457	PDR051030	Plant	Stream terraces and adjacent open outcrops	42	February 3, 2023
<i>Cambarus truncatus</i>	Oconee Burrowing Crayfish	T	null	G2	G2	S2	S2	Yes	21804	ICMAL07810	Animal	Complex burrows in sandy clay soil	24	February 3, 2023
<i>Gopherus polyphemus</i>	Gopher Tortoise	T	Null	G3	G3	S3	S3	Yes	20476	ARAAF01030	Animal	Sandhills; dry hammocks; longleaf pine-turkey oak woods; old fields	329	February 3, 2023
<i>Schisandra glabra</i>	Bay Star-vine	T	null	G3	G3	S2	S2	Yes	17301	PDSCH01020	Plant	Rich woods on stream terraces and lower slopes	71	February 3, 2023
<i>Clemmys guttata</i>	Spotted Turtle	U	null	G5	G5	S3	S3	Yes	15915	ARAAD02010	Animal	Heavily vegetated swamps, marshes, bogs, small ponds, and tidally influence freshwater wetlands; nest and possibly hibernate in surrounding uplands	136	February 3, 2023

APPENDIX D – AGENCY COORDINATION LETTERS



May 12, 2023
Mr. James Andrews
Mayor
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Andrews:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility’s existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. A project location map and proposed site plan are enclosed for reference. These additions would increase reliability in the event natural gas is curtailed or cut-off to the Facility in times of heavy loads, and would serve as a backup fuel source to maintain plant operations. No new combustion turbines will be constructed as part of the Project.

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Mr. James Andrews
City of Sandersville, City Council
May 12, 2023
Page 2

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This letter requests that your agency participate in this Project by providing information on the resources, issues, and impacts that will be addressed in the ER documentation. A Project Site Map and a Project Layout Map are included in Appendix A for your reference. Your input on any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality and wetlands
- Soils and geology
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous materials sites
- Cultural resources (historic and archaeological sites, cemeteries)
- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)

Please contact me at (470) 508-9904 or at sskent@burnsmcd.com with your feedback on these items and if you need additional information. We would appreciate your response within thirty (30) days of your receipt of this request.

Thank you for your participation and support of this Project.

Sincerely,

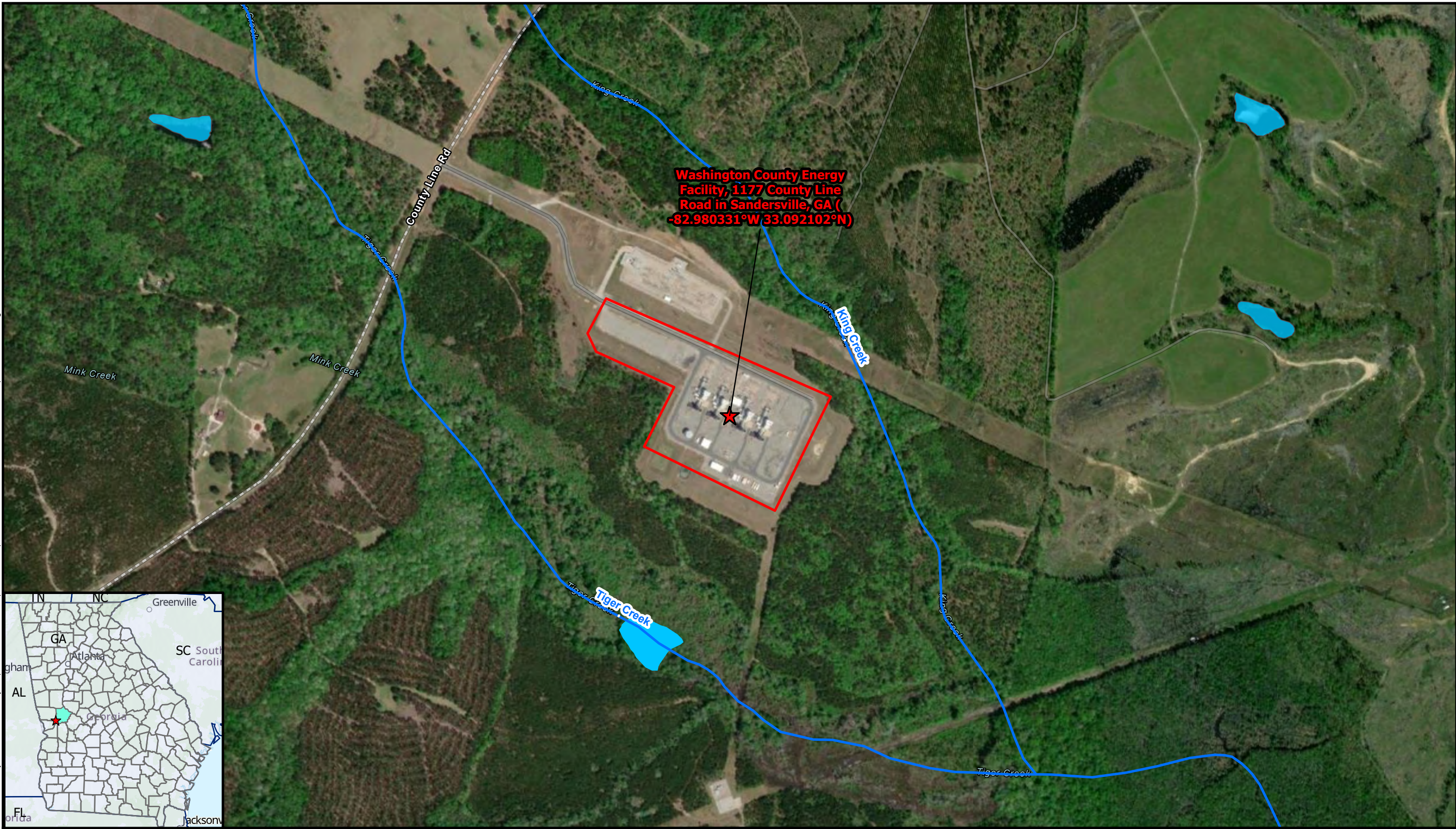


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

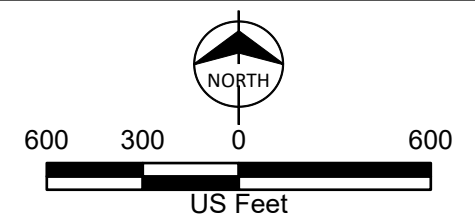
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Danny Brown
Council Post 3
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

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Mr. Danny Brown
City of Sandersville, City Council
May 12, 2023
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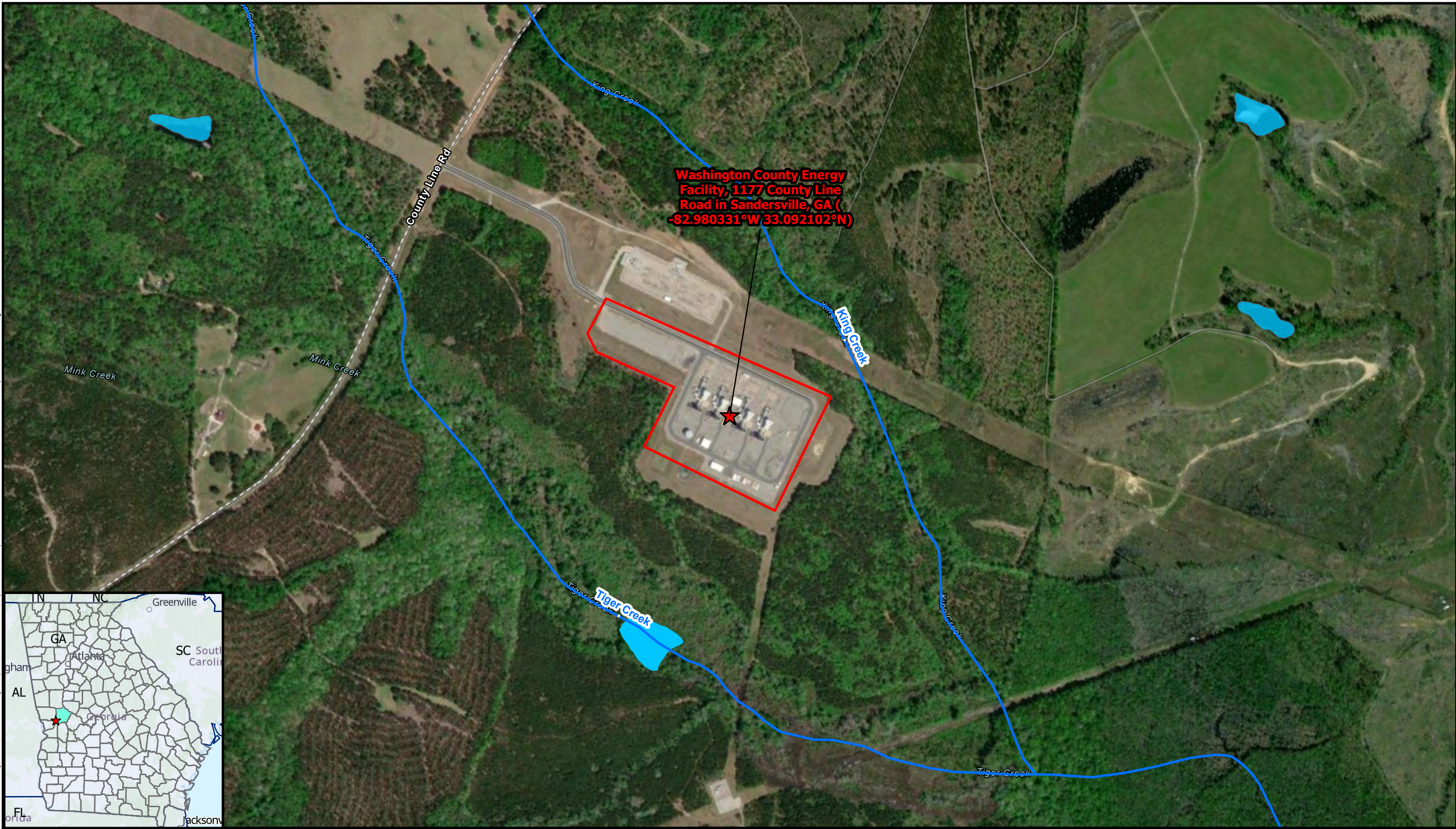


Sara Kent
Burns & McDonnell, Project Manager

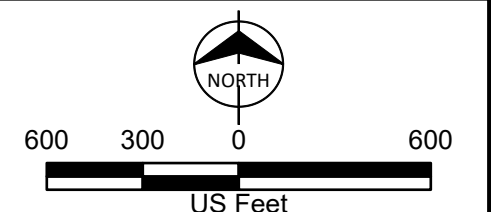
Enclosure Attachment

ATTACHMENT – PROJECT MAPS

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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Ms. Denesia Cheek
Southeast Regional Air Resource Coordinators
National Park Service, Air Resource Division
NPS-Air PO Box 25287
Denver, CO 80225

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Ms. Cheek:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Ms. Denesia Cheek
National Park Service, Air Resource Division
May 12, 2023
Page 2

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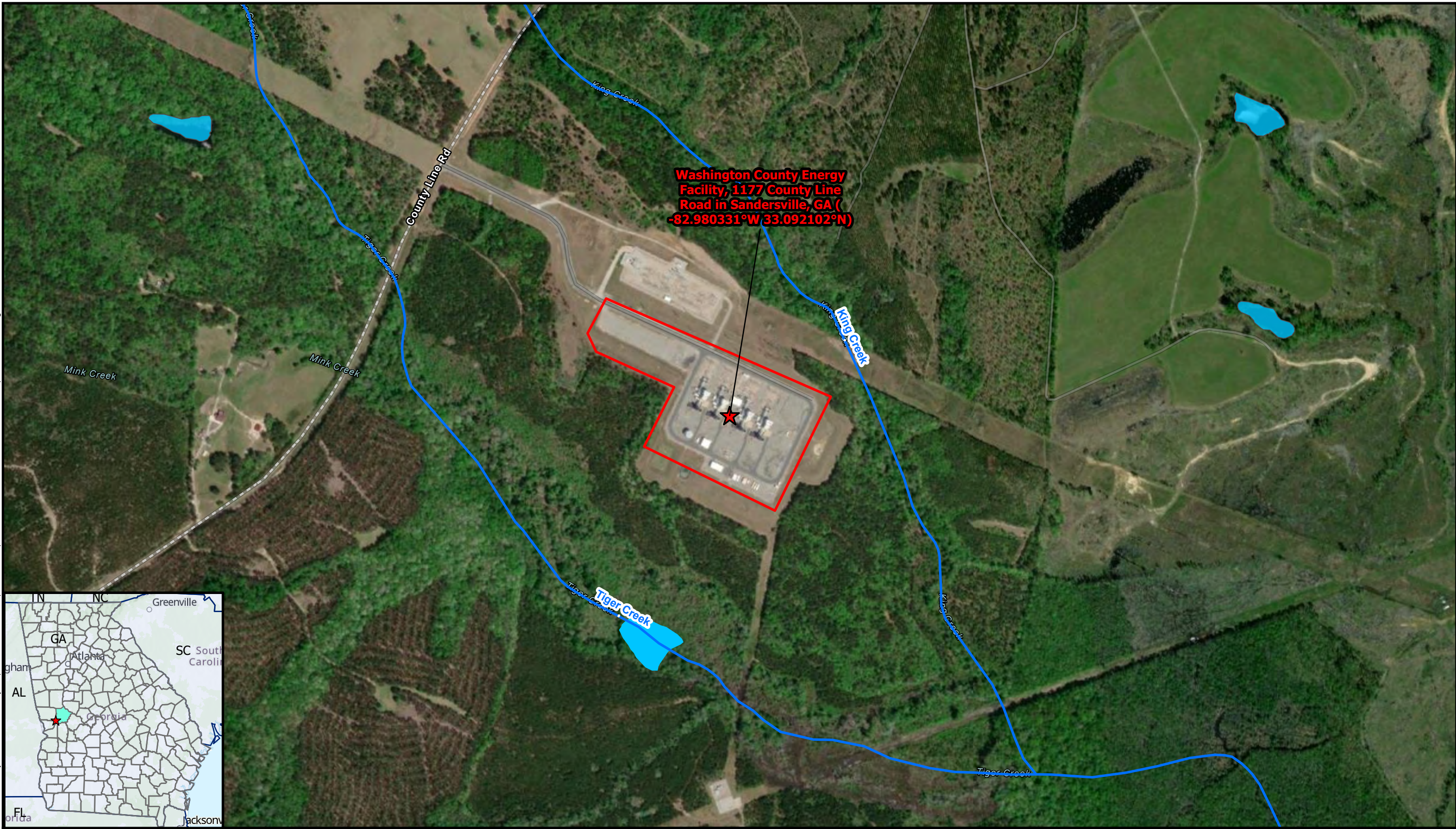


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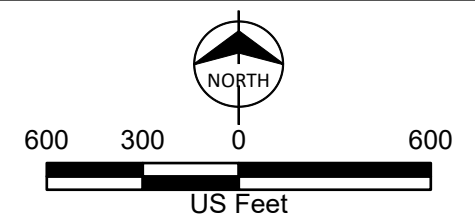
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023

Mr. Jeff Cown

Division Director

Georgia Department of Natural Resources, Historic Preservation Division

2610 GA Hwy 155 SW

Stockbridge, GA 30281

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Cown:

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Mr. Jeff Cown
Georgia Department of Natural Resources, Historic Preservation Division
May 12, 2023
Page 2

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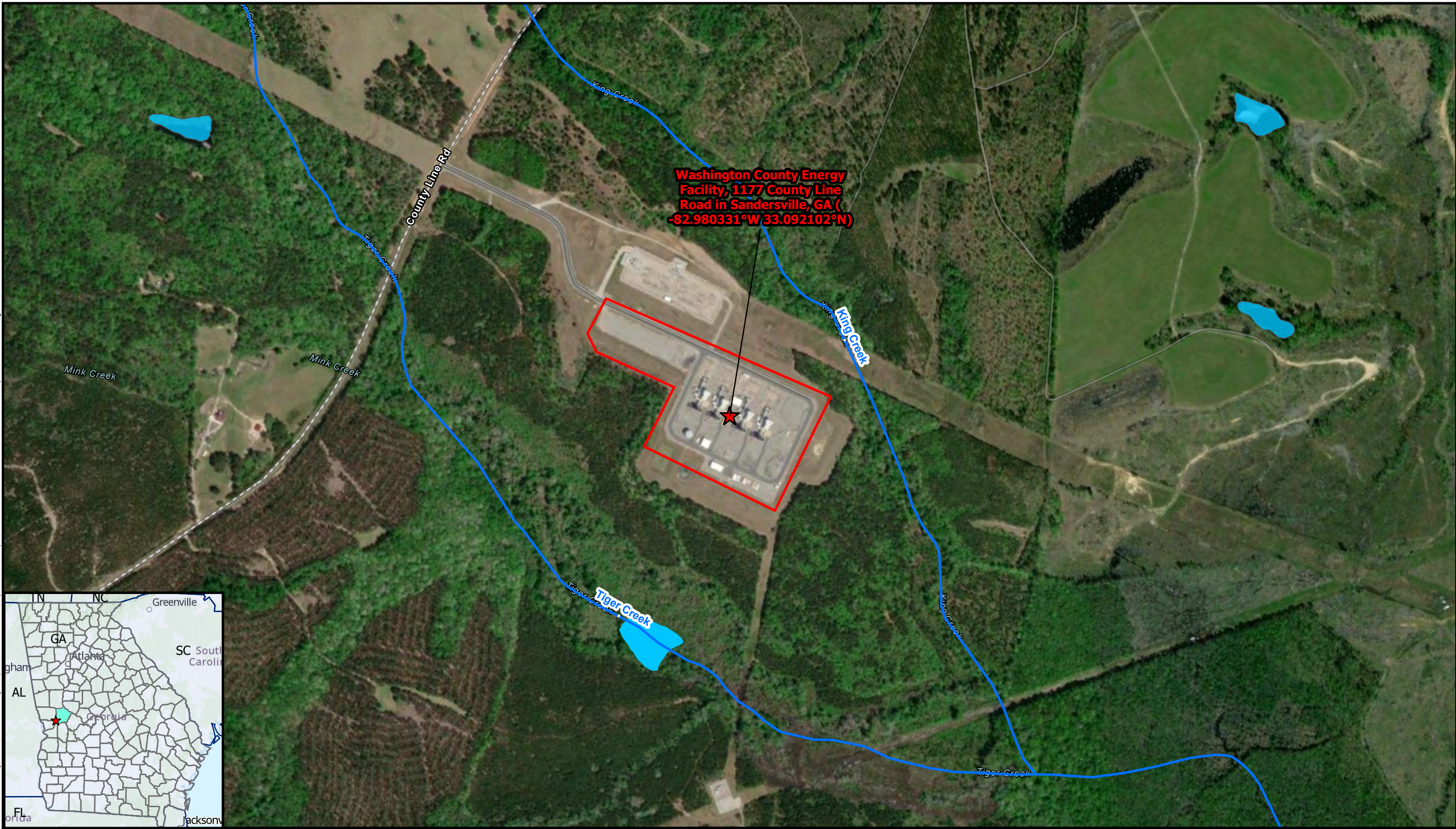


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Burns & McDonnell, Project Manager

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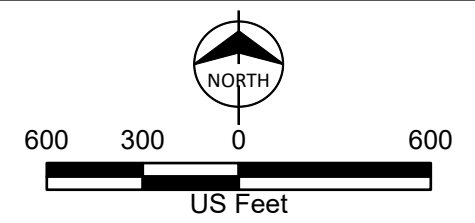
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



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- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Stephen Damaske
Stationary Source Permitting Manager
GA DNR, GA Environmental Protection Division, Air Protection Branch
4244 International Parkway
Suite 120
Atlanta, GA 30354

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Damaske:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Stephen Damaske
GA DNR, GA Environmental Protection Division, Air Protection Branch
May 12, 2023
Page 2

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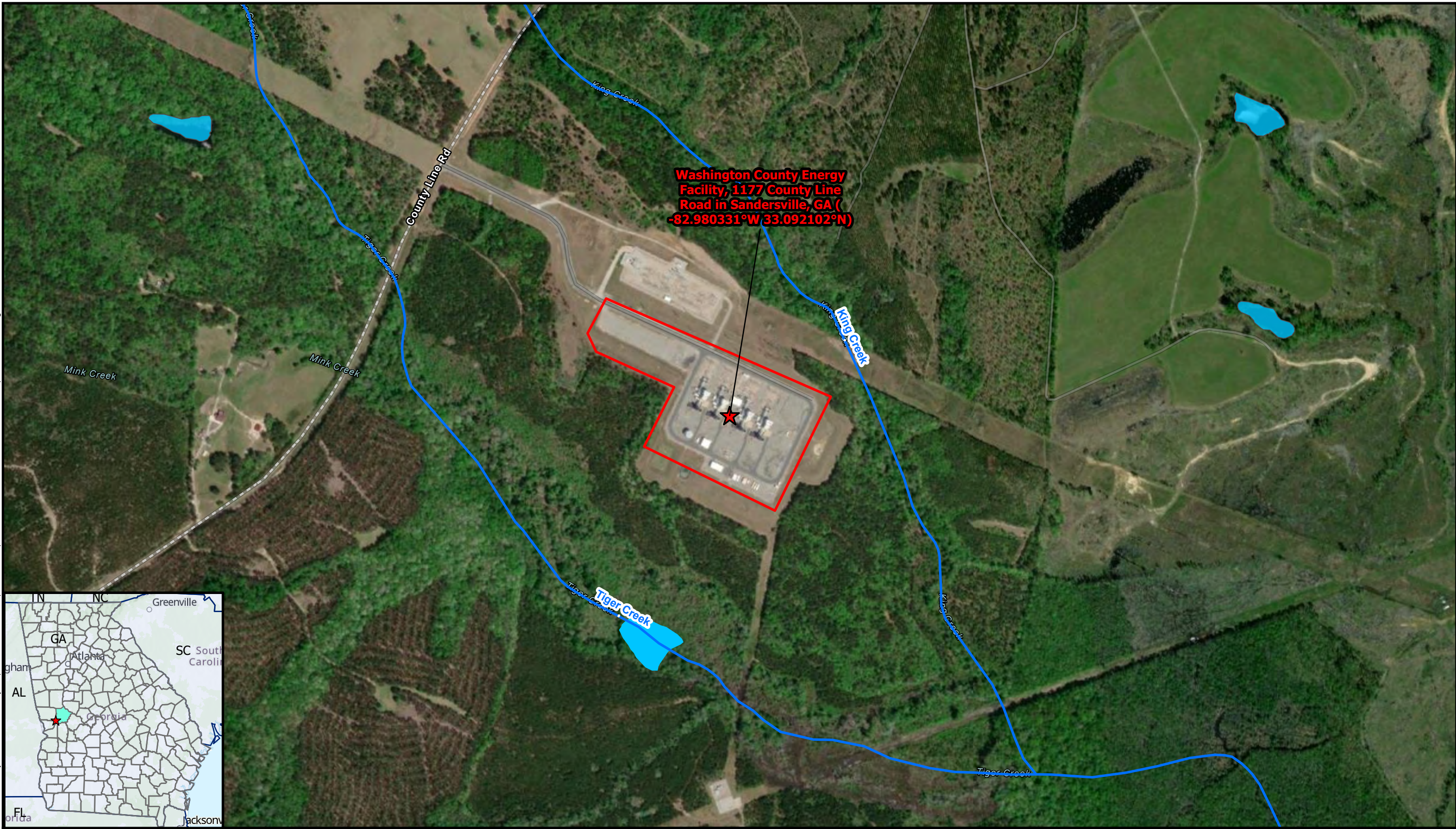
A handwritten signature in black ink that reads "Sara Kent".

Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

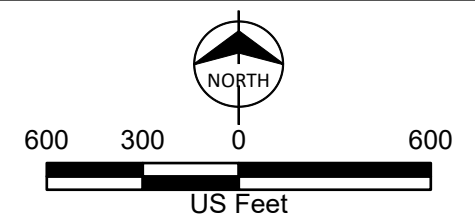
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Horace Daniel
Chairman
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

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Mr. Horace Daniel
Washington County, Board of Commissioners
May 12, 2023
Page 2

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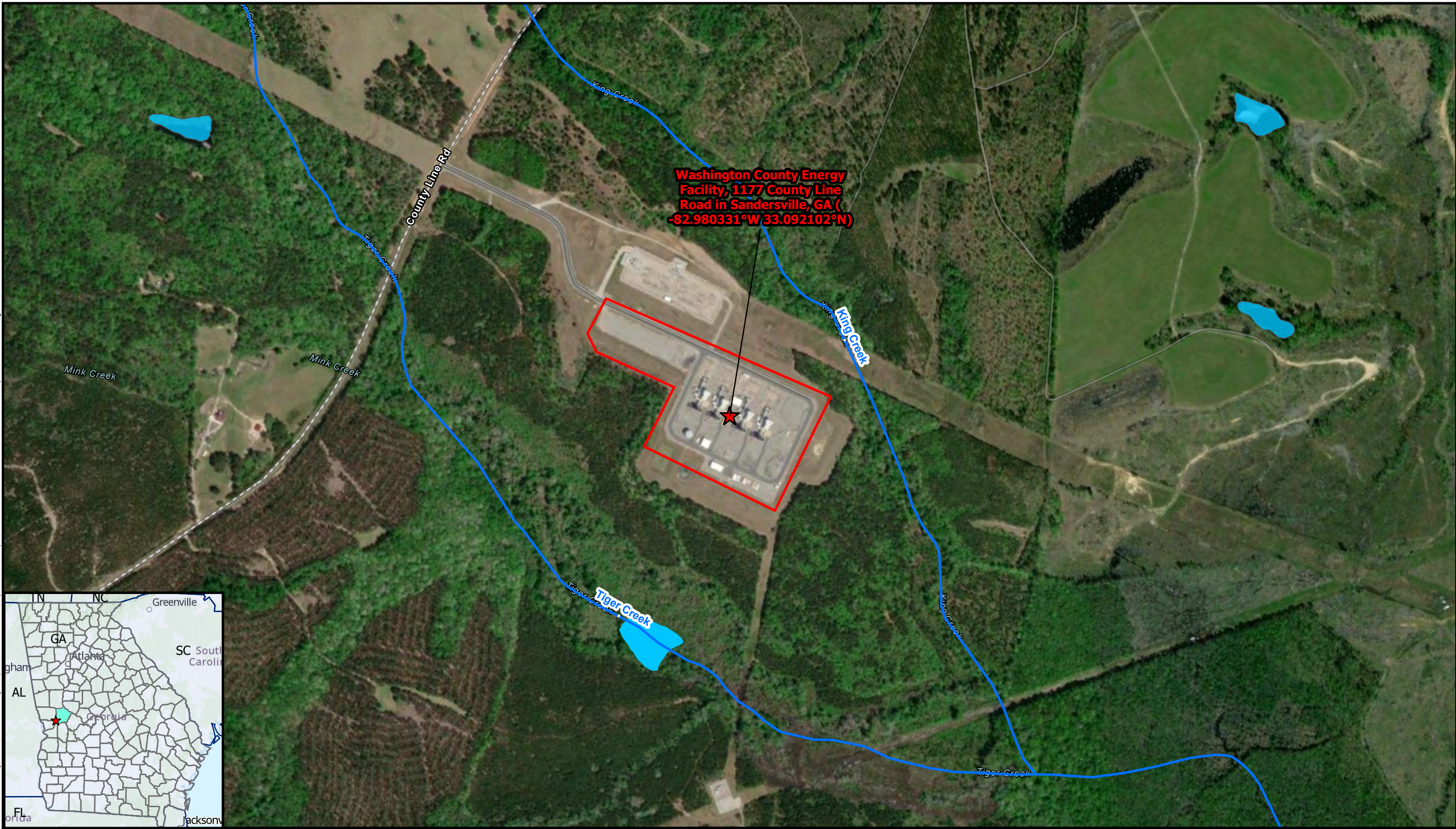


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

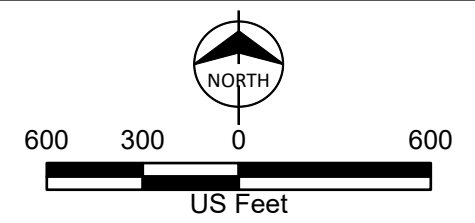
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Ms. Mayme Dennis
Council Post 1
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Ms. Dennis:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility’s existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. A project location map and proposed site plan are enclosed for reference. These additions would increase reliability in the event natural gas is curtailed or cut-off to the Facility in times of heavy loads, and would serve as a backup fuel source to maintain plant operations. No new combustion turbines will be constructed as part of the Project.

The Project would improve the efficiency and reliability for the 38 members of Oglethorpe, a not-for-profit generation cooperative. These upgrades would result in an increase in annual air emissions, and the Facility has been issued an air quality permit authorizing the Project. A small increase in water usage and discharge is also expected. Implementation of the Project is not expected to increase the noise from the Washington County Facility above historical levels nor

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Ms. Mayme Dennis
City of Sandersville, City Council
May 12, 2023
Page 2

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This letter requests that your agency participate in this Project by providing information on the resources, issues, and impacts that will be addressed in the ER documentation. A Project Site Map and a Project Layout Map are included in Appendix A for your reference. Your input on any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality and wetlands
- Soils and geology
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous materials sites
- Cultural resources (historic and archaeological sites, cemeteries)
- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)

Please contact me at (470) 508-9904 or at sskent@burnsmcd.com with your feedback on these items and if you need additional information. We would appreciate your response within thirty (30) days of your receipt of this request.

Thank you for your participation and support of this Project.

Sincerely,

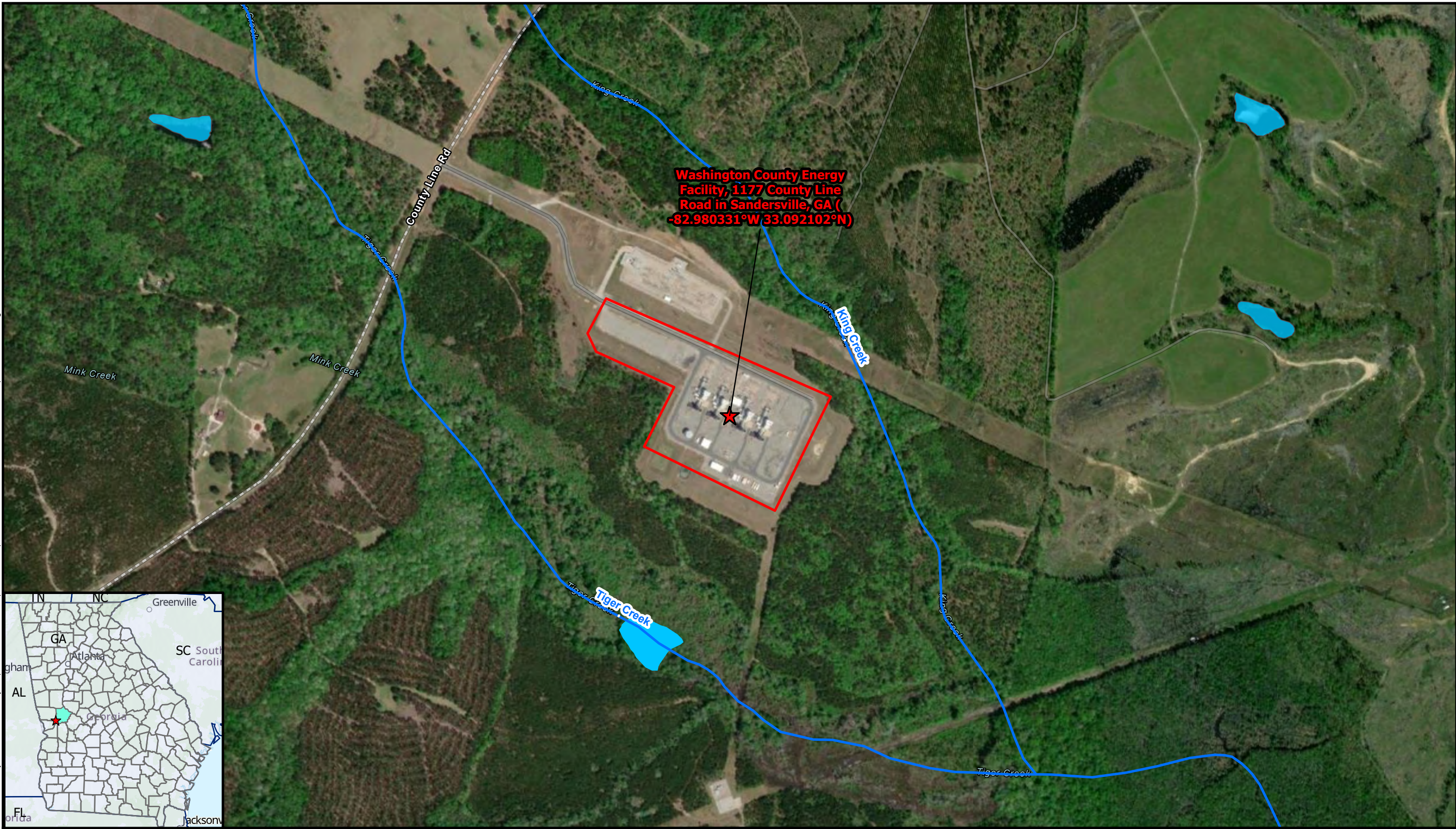


Sara Kent
Burns & McDonnell, Project Manager

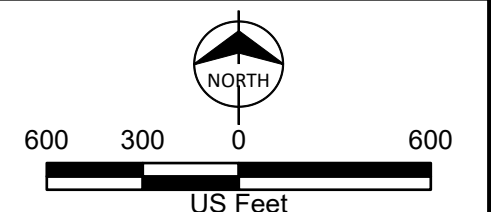
Enclosure Attachment

ATTACHMENT – PROJECT MAPS

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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Eric Duff
Administrator
GA Department of Transportation, Environmental Services
600 West Peachtree Street NW
16th Floor
Atlanta, GA 30308

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Duff:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility’s existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. A project location map and proposed site plan are enclosed for reference. These additions would increase reliability in the event natural gas is curtailed or cut-off to the Facility in times of heavy loads, and would serve as a backup fuel source to maintain plant operations. No new combustion turbines will be constructed as part of the Project.

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Mr. Eric Duff
GA Department of Transportation, Environmental Services
May 12, 2023
Page 2

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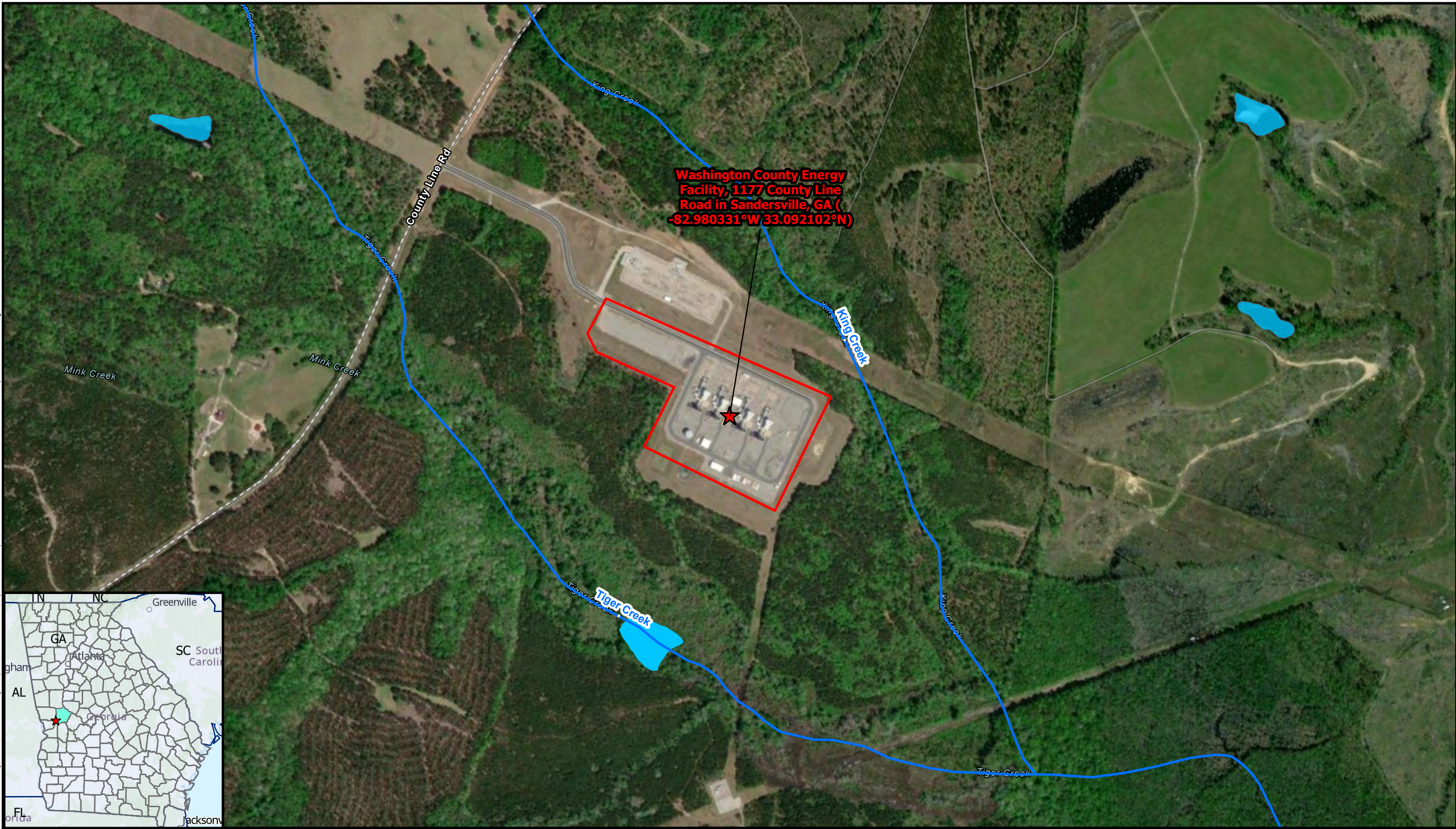
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Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

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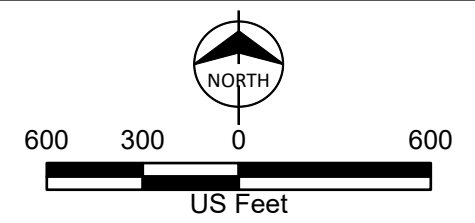
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
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- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. James Hitchcock Jr.
Board Member District 3
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Hitchcock:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. James Hitchcock Jr.
Washington County, Board of Commissioners
May 12, 2023
Page 2

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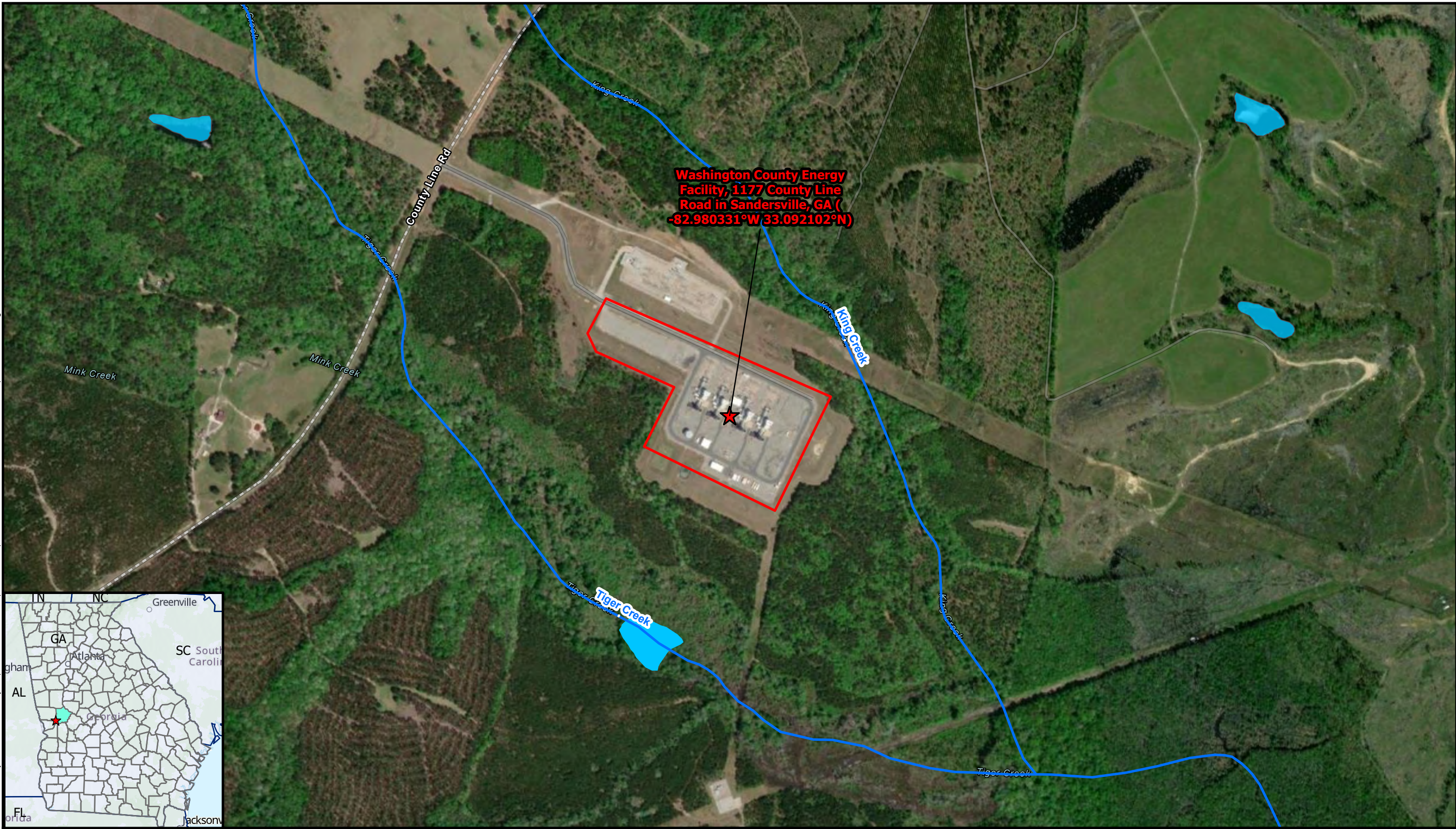


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

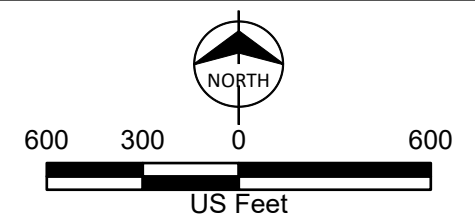
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Bobby Jackson
Board Member District 2
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Jackson:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Bobby Jackson
Washington County, Board of Commissioners
May 12, 2023
Page 2

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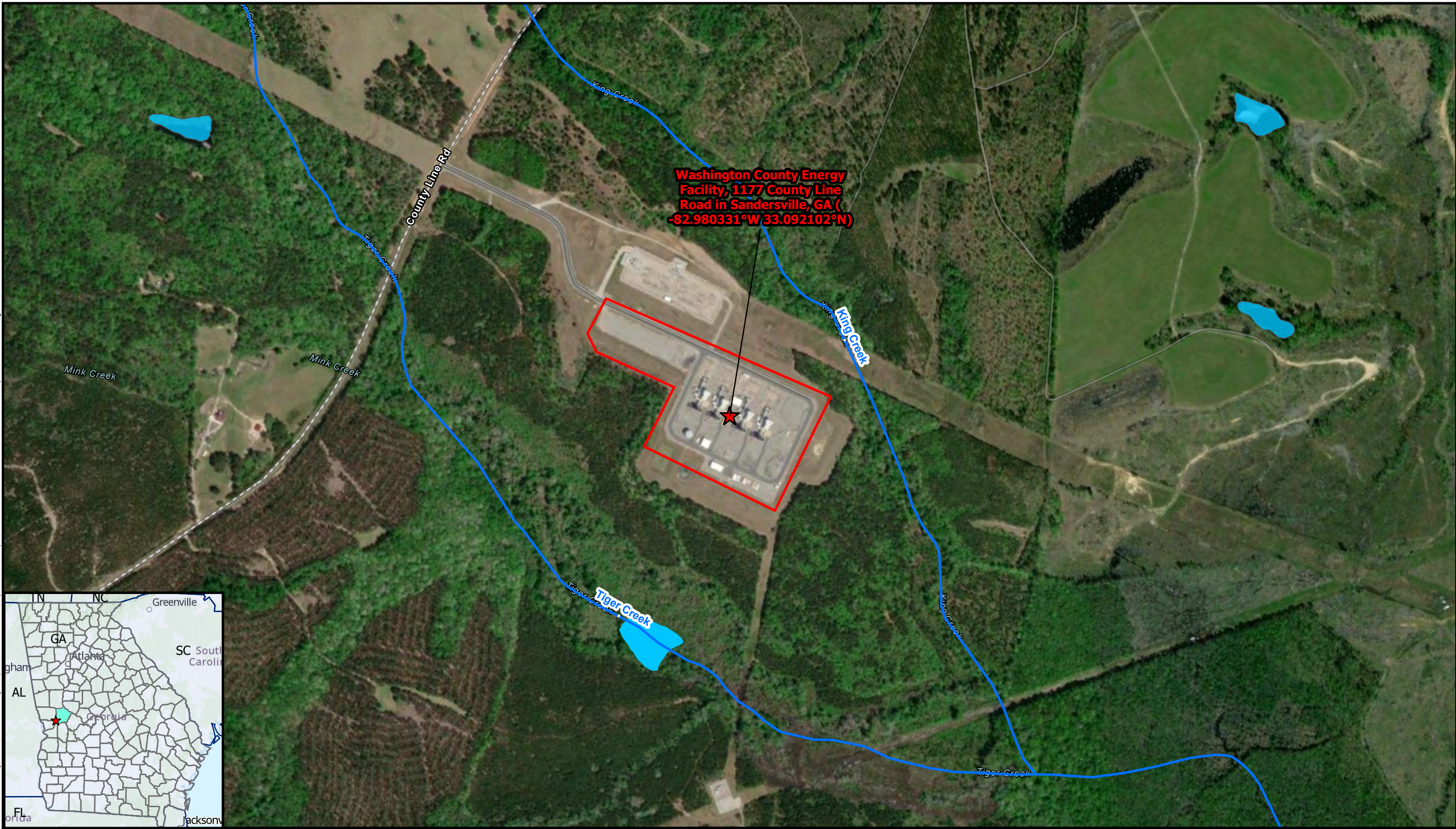


Sara Kent
Burns & McDonnell, Project Manager

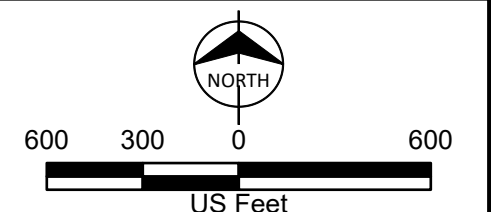
Enclosure Attachment

ATTACHMENT – PROJECT MAPS

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- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Ms. Ntale Kajumba
Chief, NEPA Program Office
U.S. Environmental Protection Agency, Atlanta Federal Center
61 Forsyth Street SW
Mail code: 9T25
Atlanta, GA 30303

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Ms. Kajumba:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Ms. Ntale Kajumba
U.S. Environmental Protection Agency, Atlanta Federal Center
May 12, 2023
Page 2

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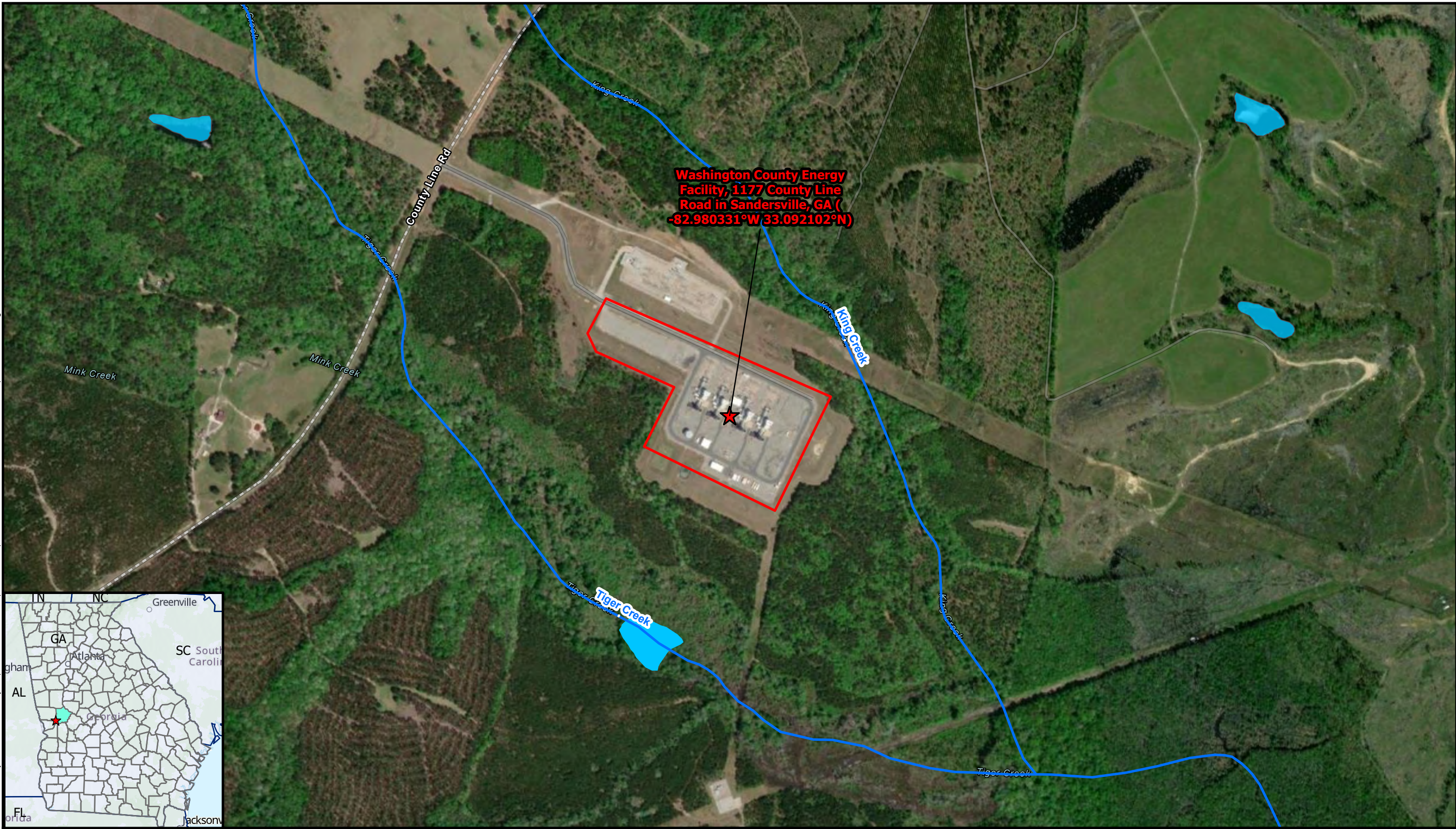
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Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

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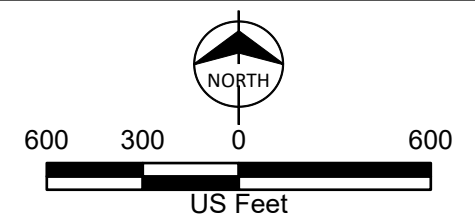
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Dustin Peebles
Administrator and Clerk
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Peebles:

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Mr. Dustin Peebles
Washington County, Board of Commissioners
May 12, 2023
Page 2

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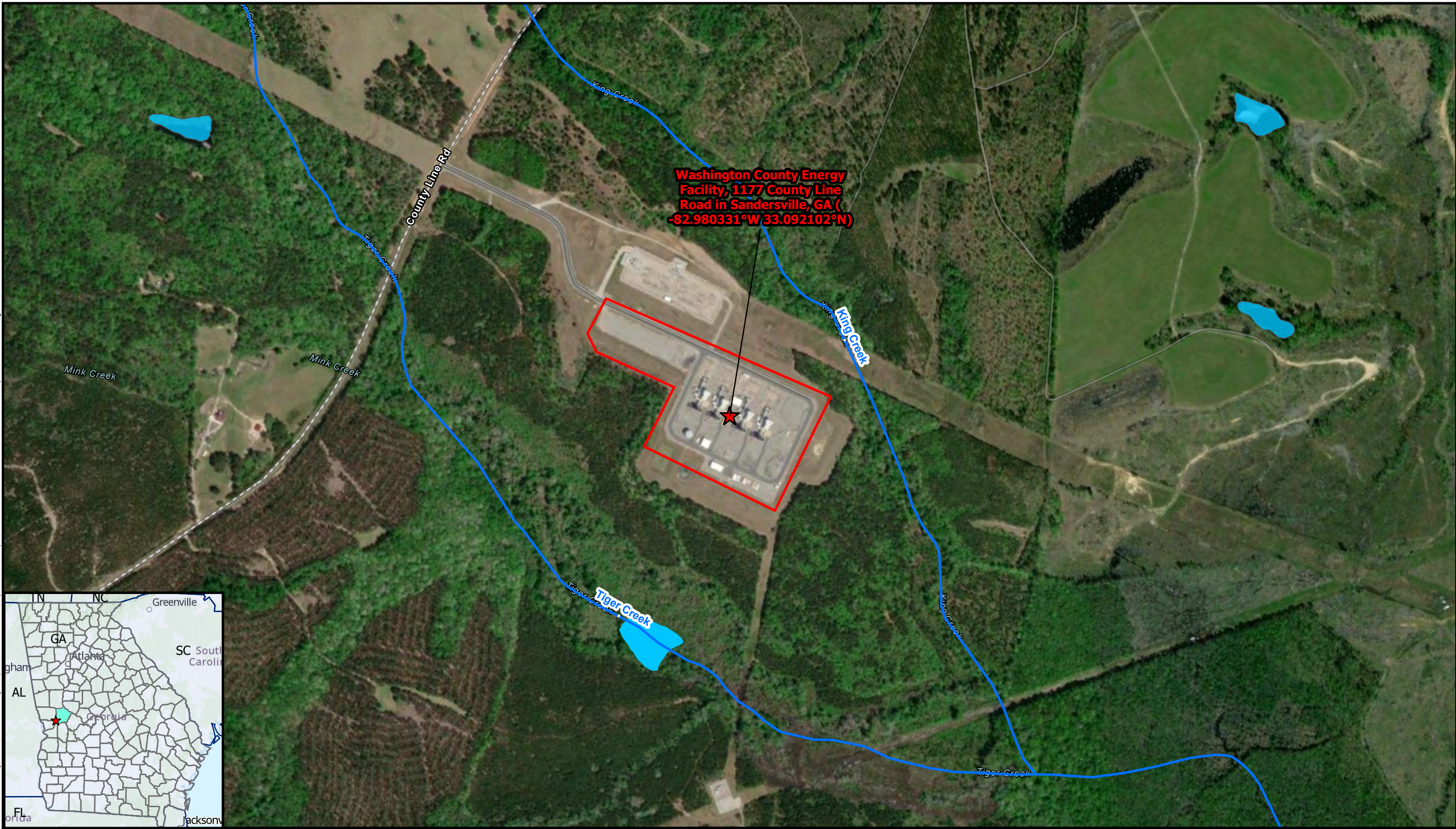


Sara Kent
Burns & McDonnell, Project Manager

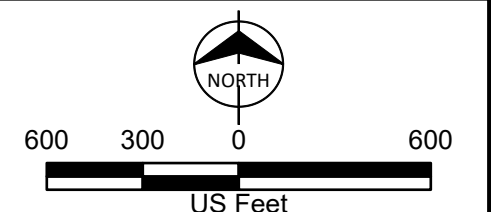
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Corbett Reynolds
District Engineer
GA Department of Transportation
161 Blandy Road
Milledgeville, GA 31601

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Reynolds:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility’s existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. A project location map and proposed site plan are enclosed for reference. These additions would increase reliability in the event natural gas is curtailed or cut-off to the Facility in times of heavy loads, and would serve as a backup fuel source to maintain plant operations. No new combustion turbines will be constructed as part of the Project.

The Project would improve the efficiency and reliability for the 38 members of Oglethorpe, a not-for-profit generation cooperative. These upgrades would result in an increase in annual air emissions, and the Facility has been issued an air quality permit authorizing the Project. A small increase in water usage and discharge is also expected. Implementation of the Project is not expected to increase the noise from the Washington County Facility above historical levels nor

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Mr. Corbett Reynolds
GA Department of Transportation
May 12, 2023
Page 2

will it require changes in the gas supply infrastructure for the Washington County Facility. All infrastructure improvement and ground disturbing activities would occur within the existing Facility footprint.

This letter requests that your agency participate in this Project by providing information on the resources, issues, and impacts that will be addressed in the ER documentation. A Project Site Map and a Project Layout Map are included in Appendix A for your reference. Your input on any of the following resources is appreciated:

- Land use
- Aesthetics
- Water quality and wetlands
- Soils and geology
- Wildlife, vegetation and fisheries, including threatened and endangered species
- Socioeconomics (population, employment, growth, development)
- Hazardous materials sites
- Cultural resources (historic and archaeological sites, cemeteries)
- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)

Please contact me at (470) 508-9904 or at sskent@burnsmcd.com with your feedback on these items and if you need additional information. We would appreciate your response within thirty (30) days of your receipt of this request.

Thank you for your participation and support of this Project.

Sincerely,

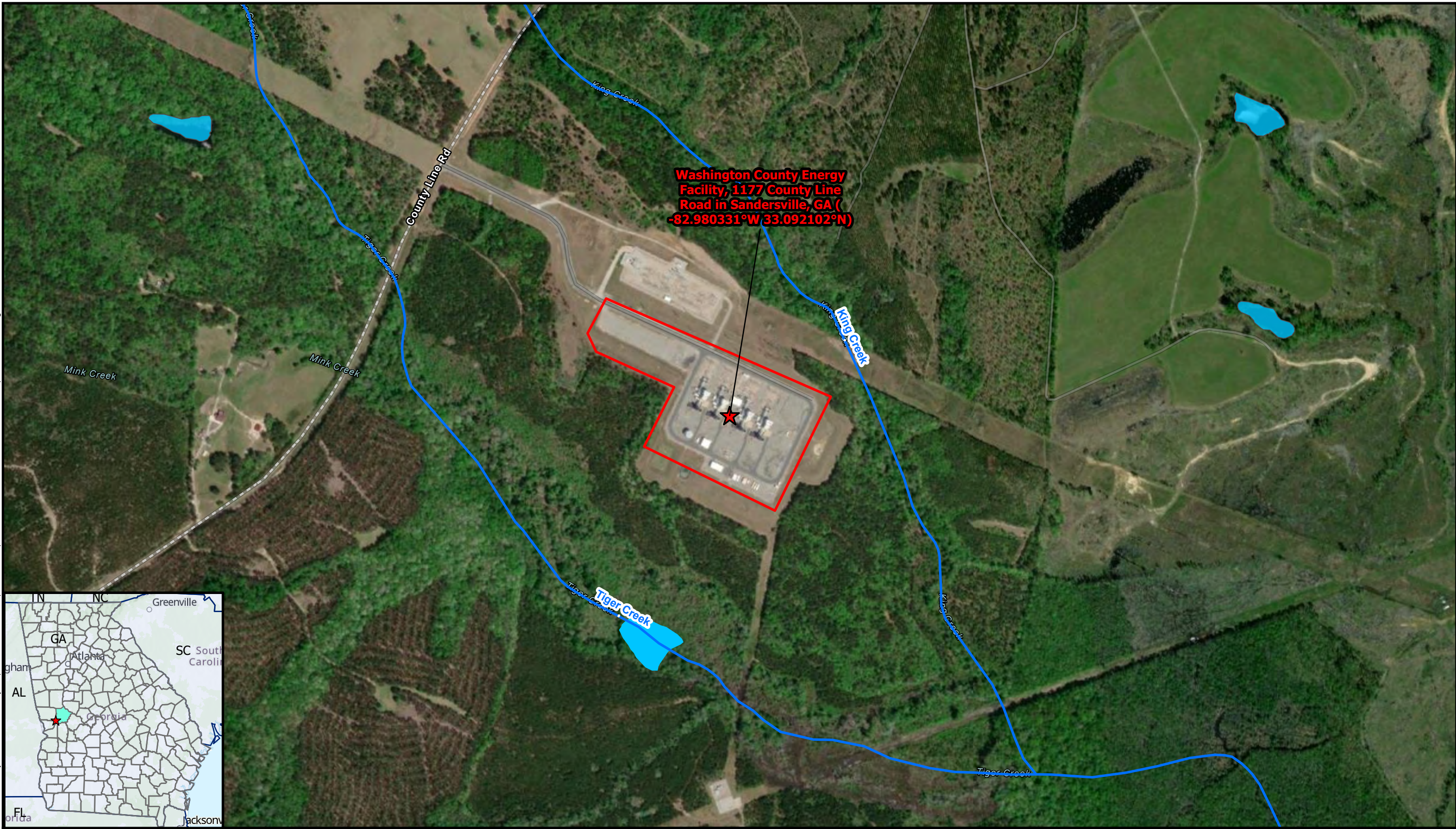


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

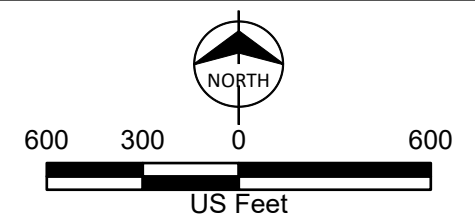
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Terrance Rudolph
State Conservationist
National Resources Conservation Service, GA State Office
355 East Hancock Avenue
Athens, GA 30601

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Rudolph:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Terrance Rudolph
National Resources Conservation Service, GA State Office
May 12, 2023
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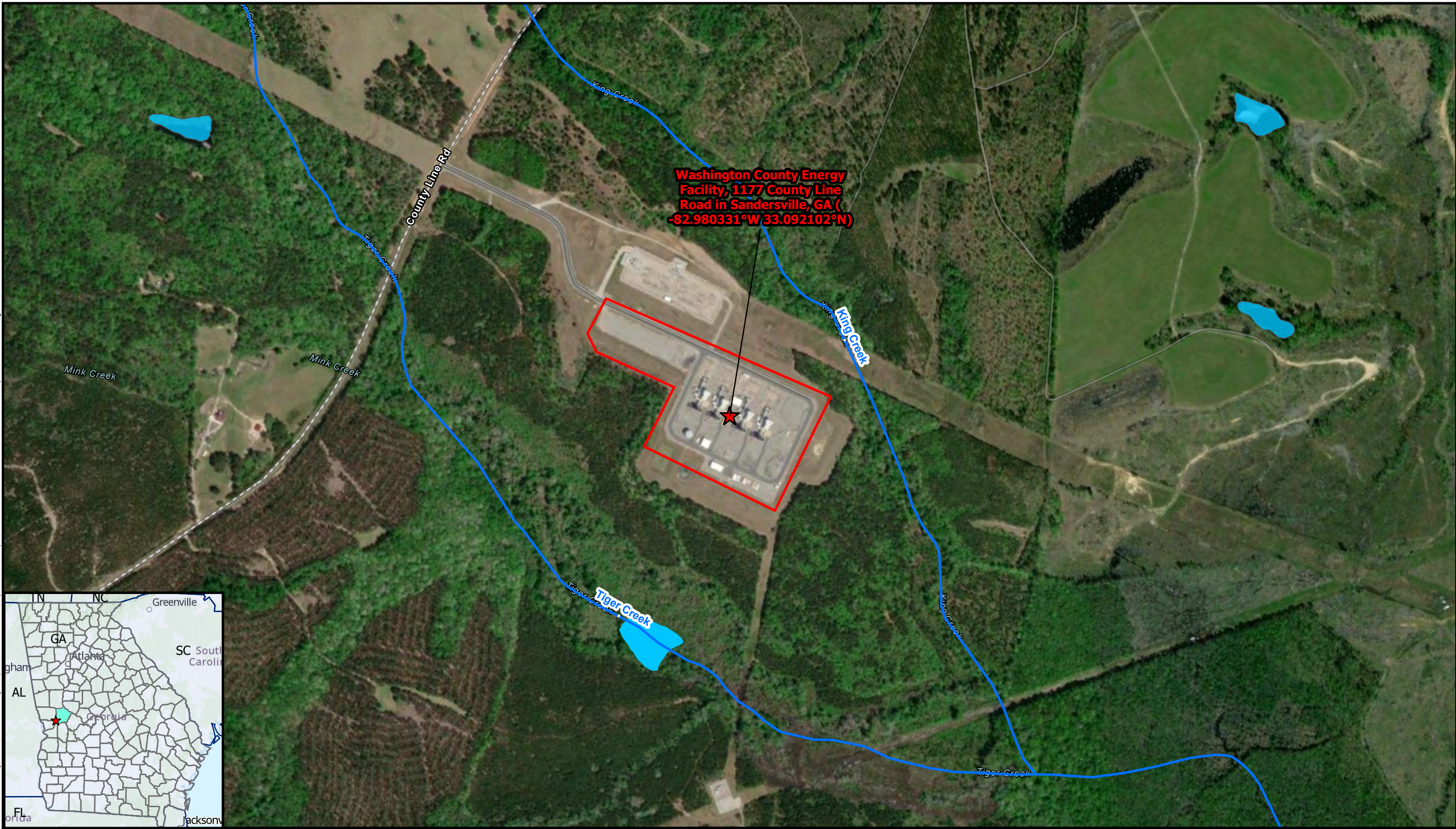


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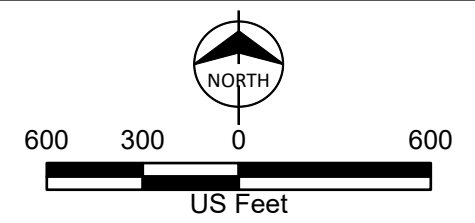
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. William Rutlin
Chief, Coastal Branch
U.S. Army Corps of Engineers, Savannah District, Regulatory Division
100 W. Oglethorpe Avenue
Savannah, GA 31402

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Rutlin:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. William Rutlin
U.S. Army Corps of Engineers, Savannah District, Regulatory Division
May 12, 2023
Page 2

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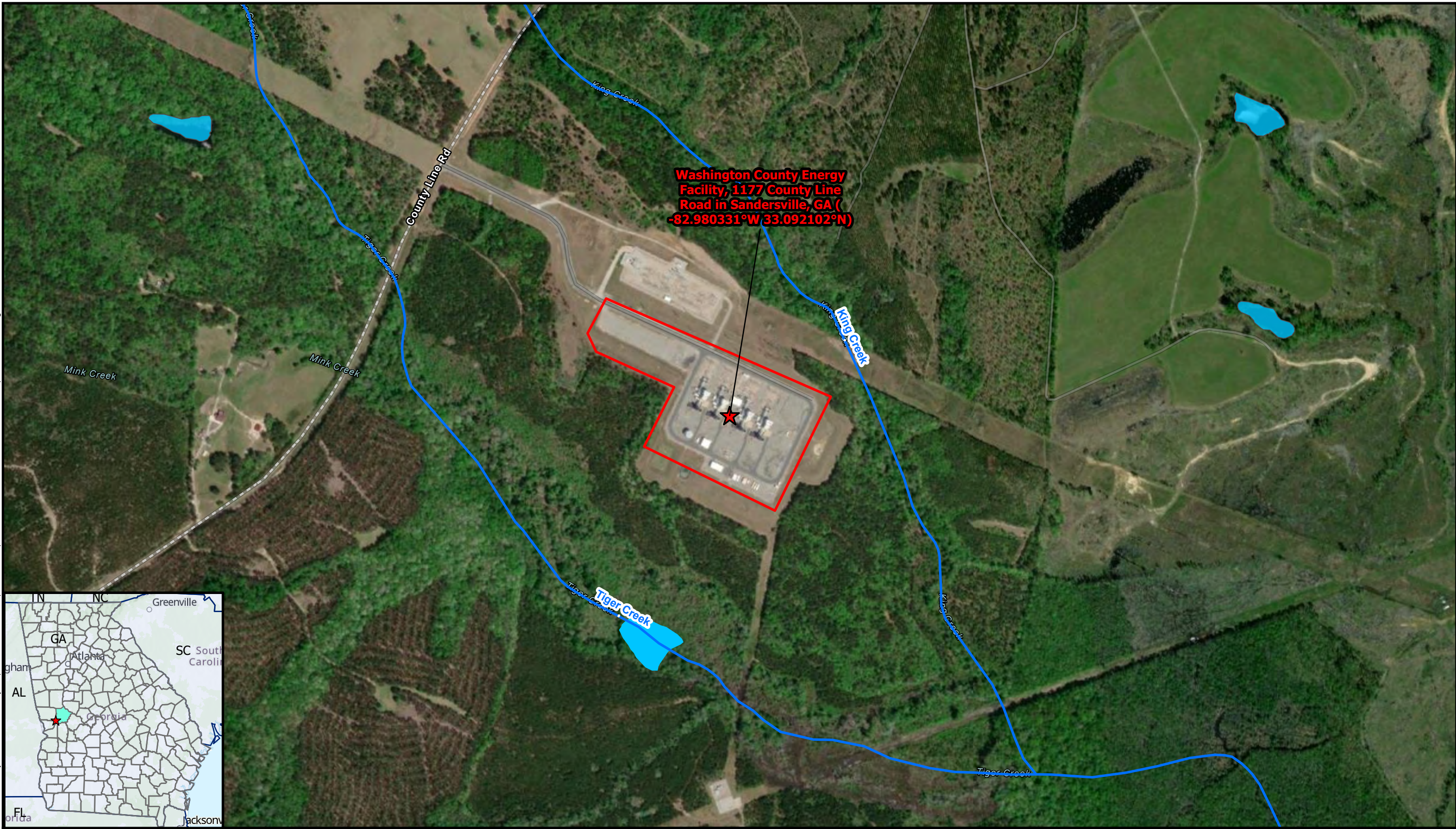


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Enclosure Attachment

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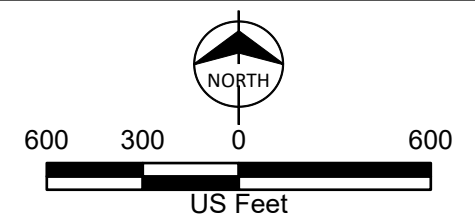
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Ben Salter
Council Post 4
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Salter:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Ben Salter
City of Sandersville, City Council
May 12, 2023
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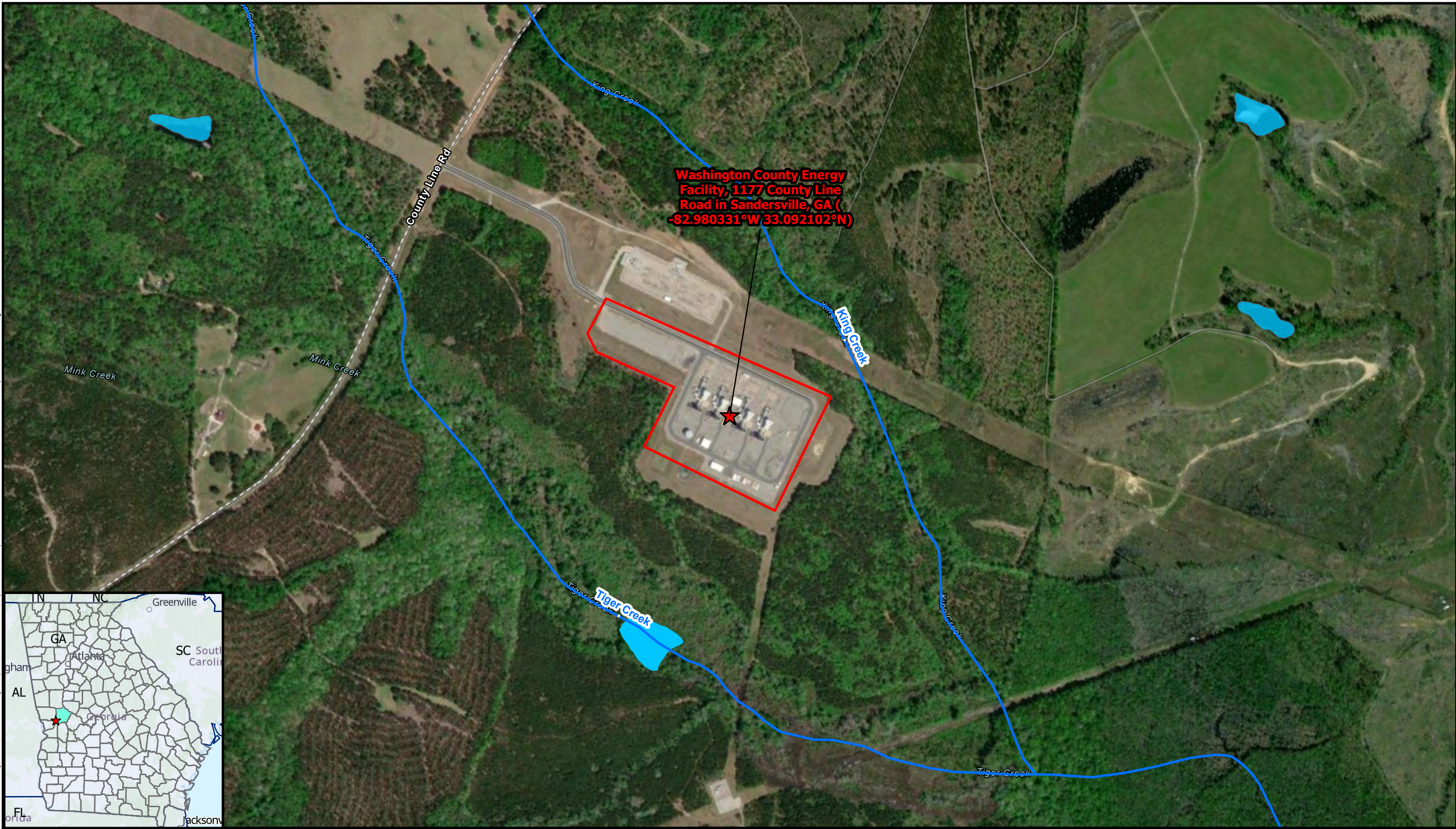


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

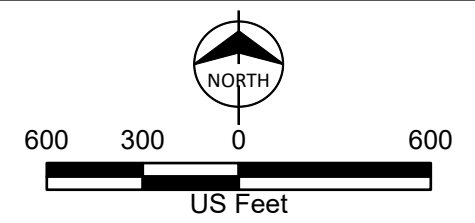
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



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- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Frank Simmons Jr.
Board Member District 4
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Simmons:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Frank Simmons Jr.
Washington County, Board of Commissioners
May 12, 2023
Page 2

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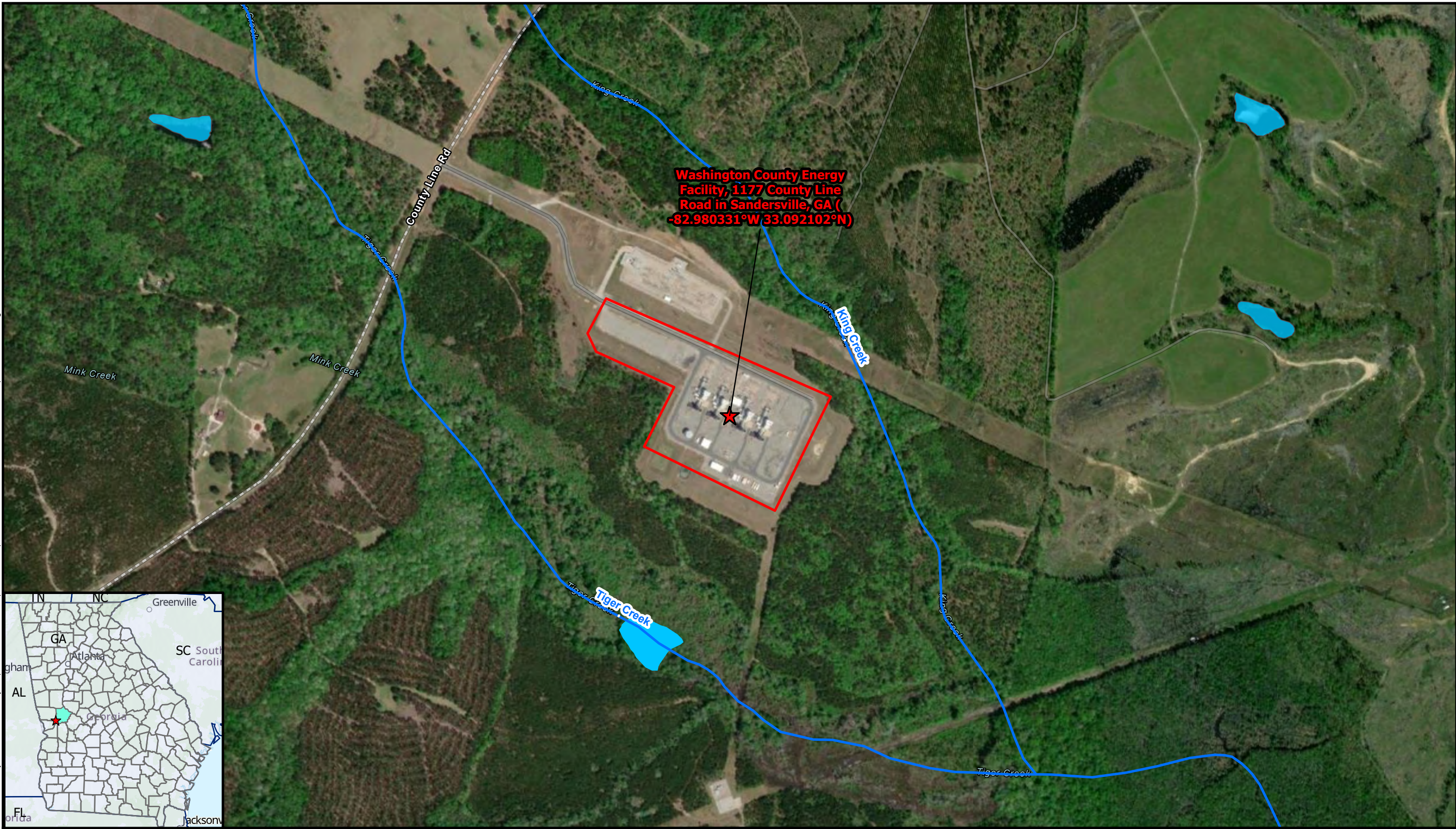


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Burns & McDonnell, Project Manager

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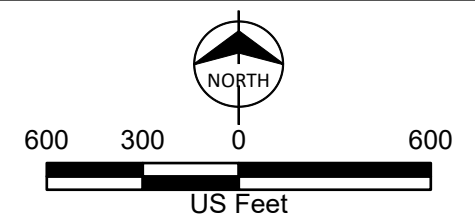
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Jeffery Smith
Mayor Pro – Tem
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Smith:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Jeffery Smith
City of Sandersville, City Council
May 12, 2023
Page 2

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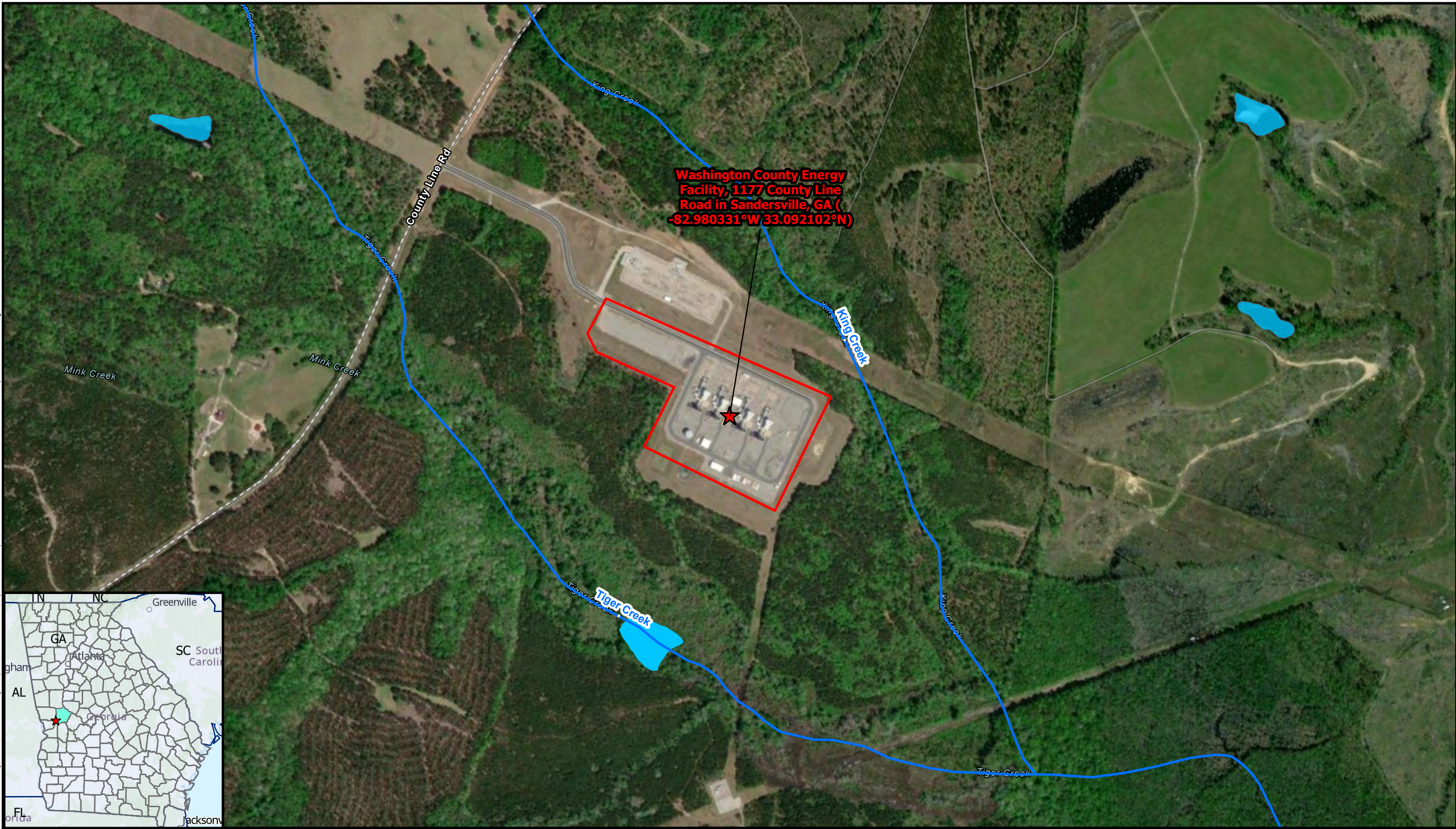


Sara Kent
Burns & McDonnell, Project Manager

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ATTACHMENT – PROJECT MAPS

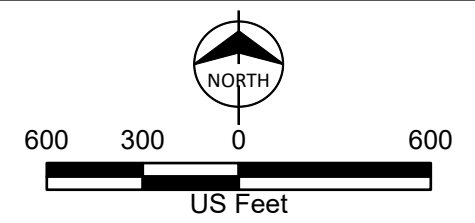
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Ms. Joyce Stanley
Regional Environmental Officer - Atlanta
U.S. Department of the Interior, Office of Environmental Policy and Compliance
75 Ted Turner Drive SW
Suite 1144
Atlanta, GA 30303

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Ms. Stanley:

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Ms. Joyce Stanley
U.S. Department of the Interior, Office of Environmental Policy and Compliance
May 12, 2023
Page 2

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- Land use
- Aesthetics
- Water quality and wetlands
- Soils and geology
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- Socioeconomics (population, employment, growth, development)
- Hazardous materials sites
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- Transportation and roads (airport and roadway expansions, construction, operations and maintenance)

Please contact me at (470) 508-9904 or at sskent@burnsmcd.com with your feedback on these items and if you need additional information. We would appreciate your response within thirty (30) days of your receipt of this request.

Thank you for your participation and support of this Project.

Sincerely,

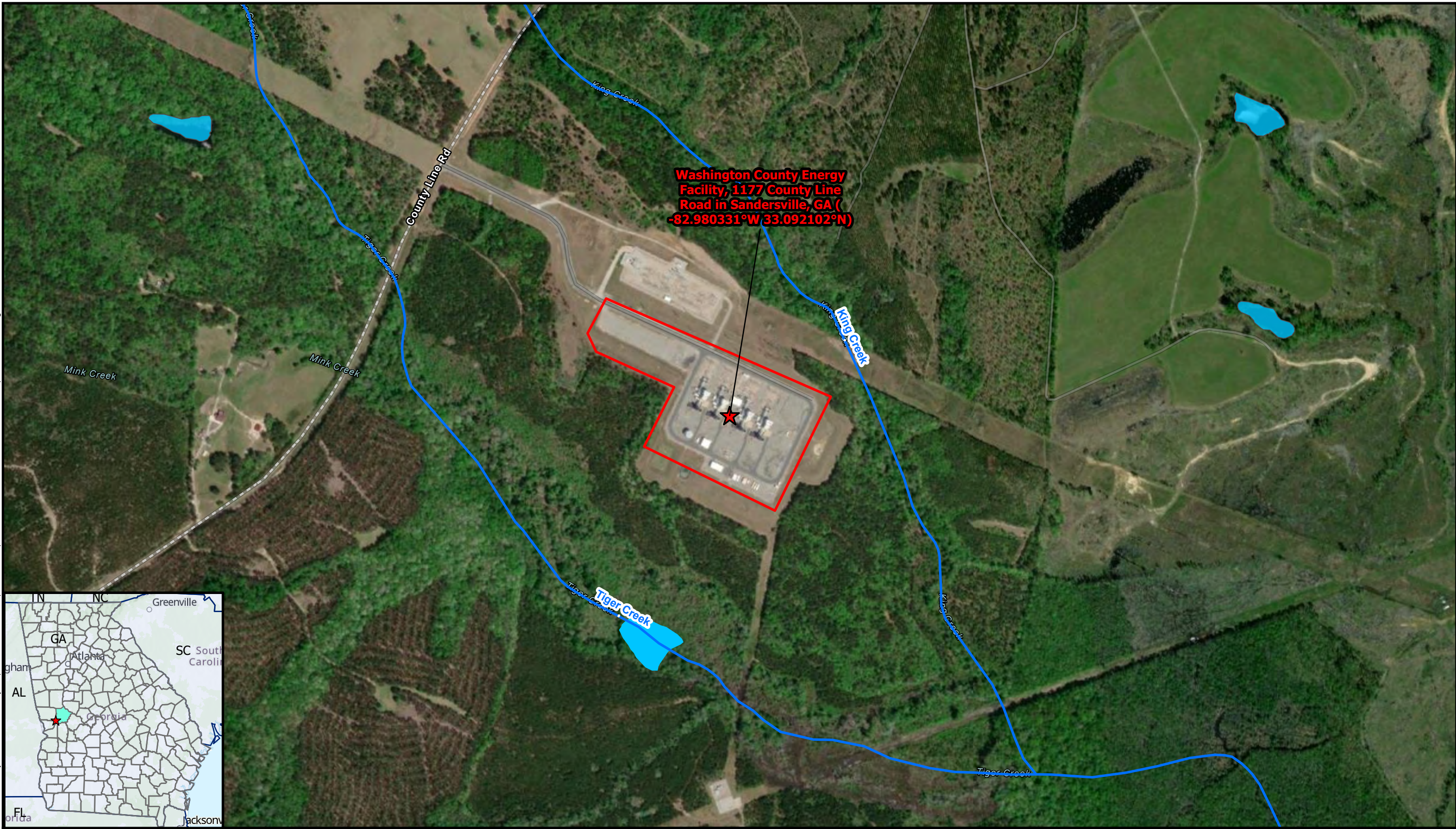
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Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

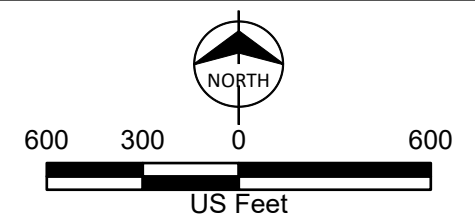
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Scotty Thomas
District Conservationist
National Resources Conservation Service, Sandersville Service Center
1222 S. Harris Street
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Thomas:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Mr. Scotty Thomas
National Resources Conservation Service, Sandersville Service Center
May 12, 2023
Page 2

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- Land use
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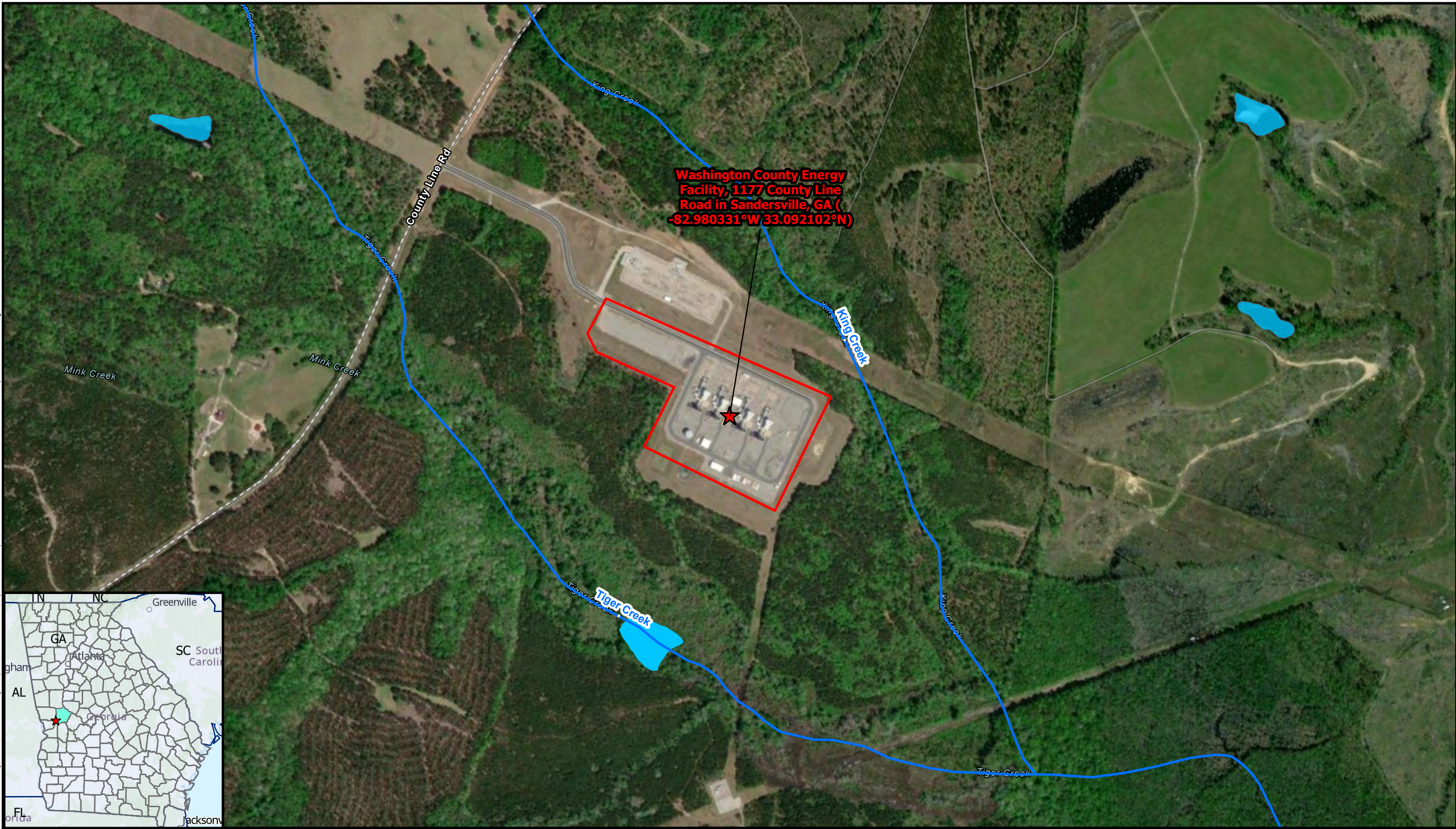


Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

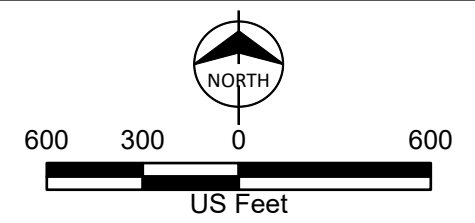
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023

Ms. Anna Truszczynski

Branch Chief

GA DNR, GA Environmental Protection Division, Watershed Protection Branch

2 Martin Luther King Jr. Drive

Suite 14701

Atlanta, GA 30334

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Ms. Truszczynski:

Oglethorpe Power Corporation (“Oglethorpe”) will be conducting an Environmental Assessment (EA) for the U.S. Department of Agriculture’s (USDA) Rural Utilities Services (RUS), as required by the National Environmental Policy Act (NEPA). Oglethorpe plans to submit a financing request to the USDA’s RUS to upgrade their existing, natural gas – fired combustion turbines at Washington County Energy Facility to have dual fuel capabilities. Burns & McDonnell has been contracted by Oglethorpe to prepare an environmental report (ER) for submittal to RUS for preparation of an EA for the Dual Fuel Conversion Project (the “Project”) at Oglethorpe’s Washington County Energy Facility¹ located in Washington County, near Sandersville, Georgia (the “Facility”) at 1177 County Line Rd (-82.980331°W 33.092102°N).

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Ms. Anna Truszczynski
GA DNR, GA Environmental Protection Division, Watershed Protection Branch
May 12, 2023
Page 2

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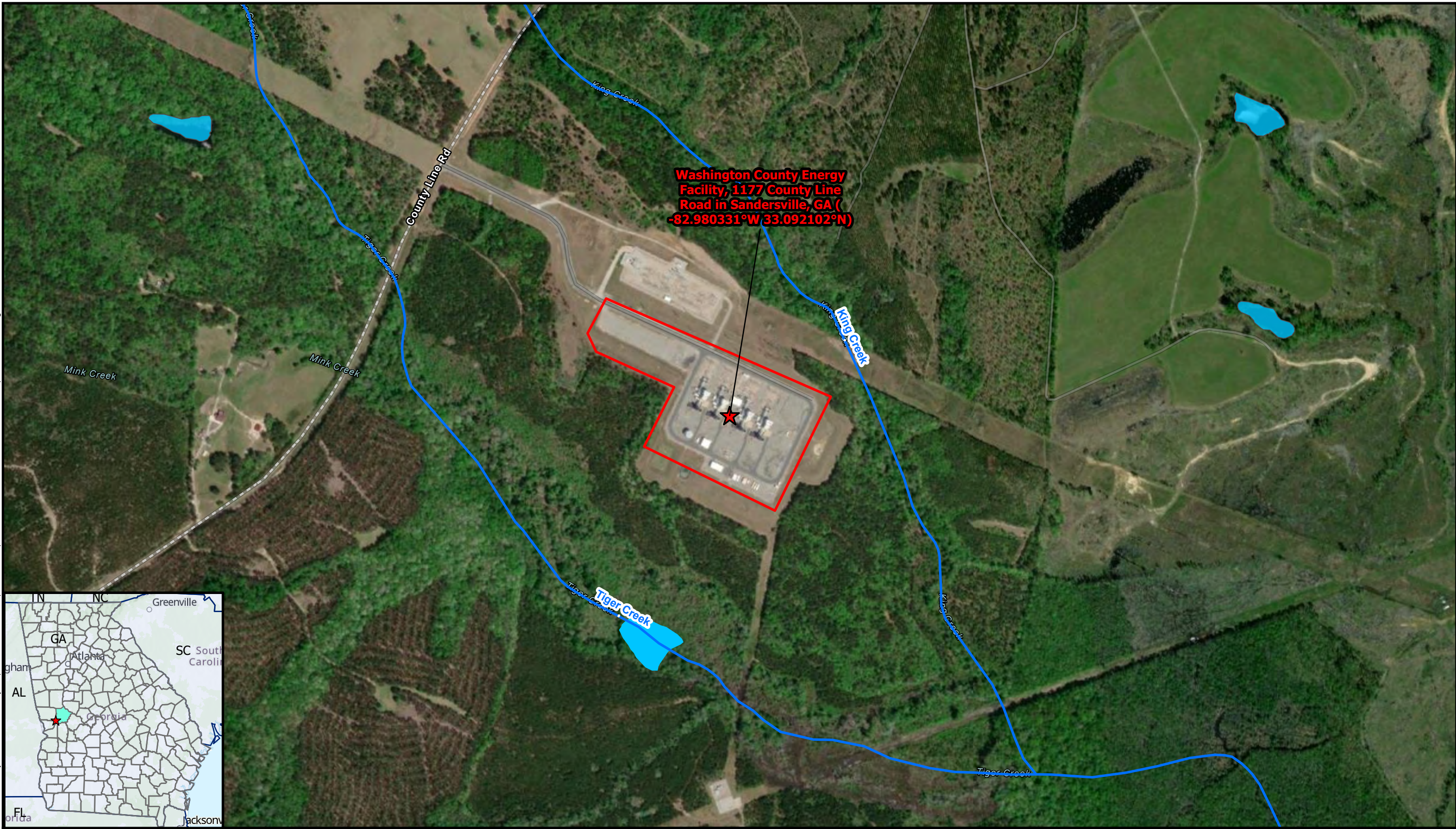
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Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

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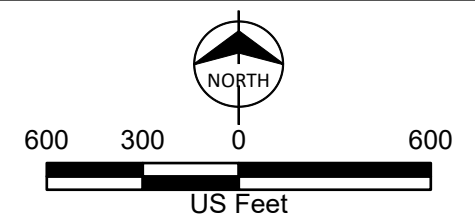
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Doug Watkins
Board Member District 1
Washington County, Board of Commissioners
PO Box 25287
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Watkins:

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Mr. Doug Watkins
Washington County, Board of Commissioners
May 12, 2023
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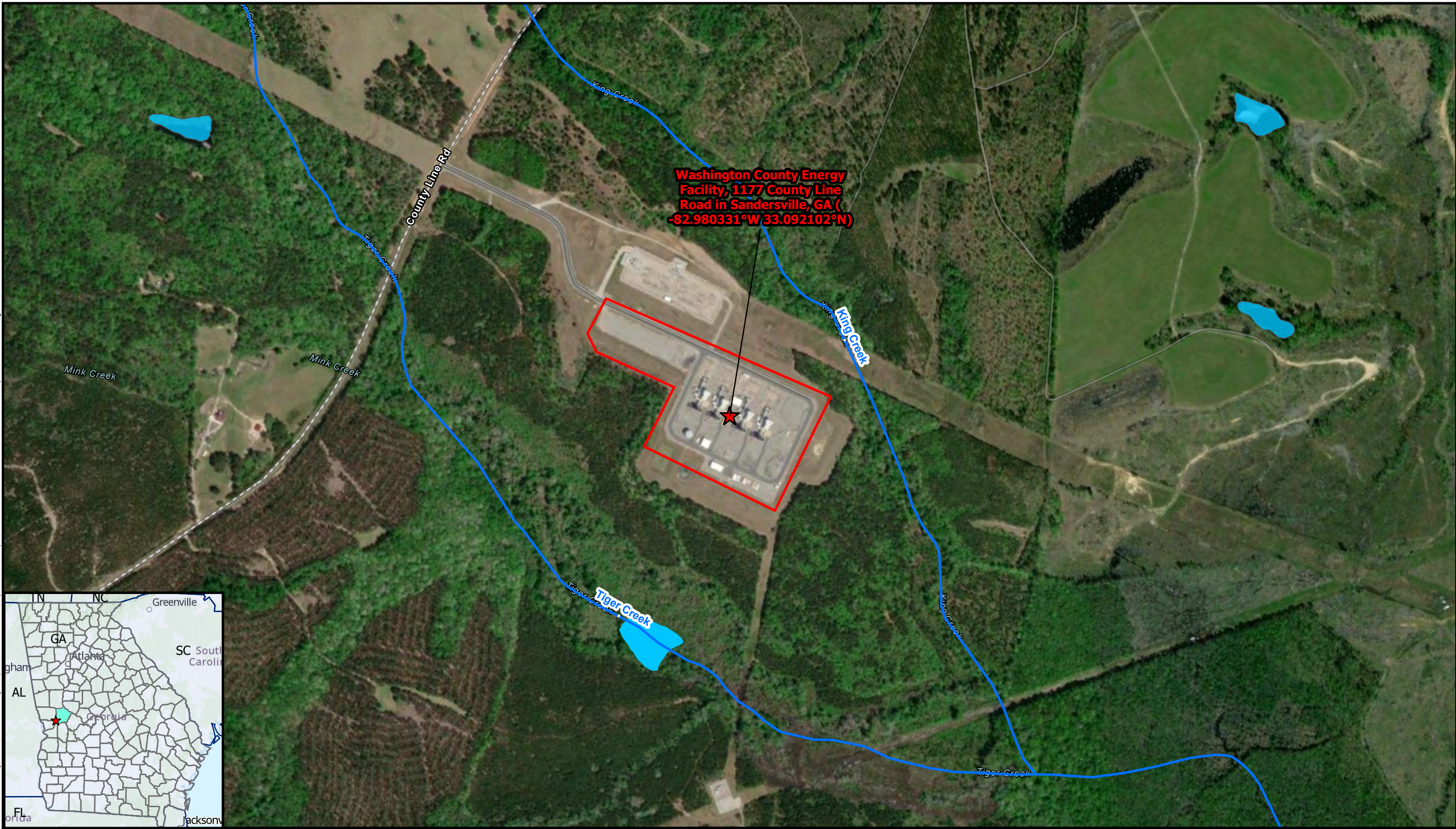


Sara Kent
Burns & McDonnell, Project Manager

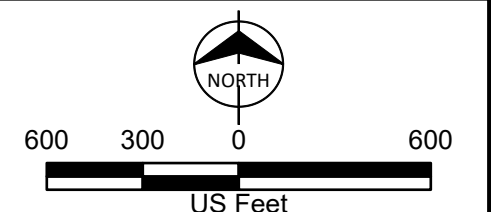
Enclosure Attachment

ATTACHMENT – PROJECT MAPS

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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Henry Watts
Council Post 2
City of Sandersville, City Council
141 W. Haynes St.
Sandersville, GA 31082

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr. Watts:

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Mr. Henry Watts
City of Sandersville, City Council
May 12, 2023
Page 2

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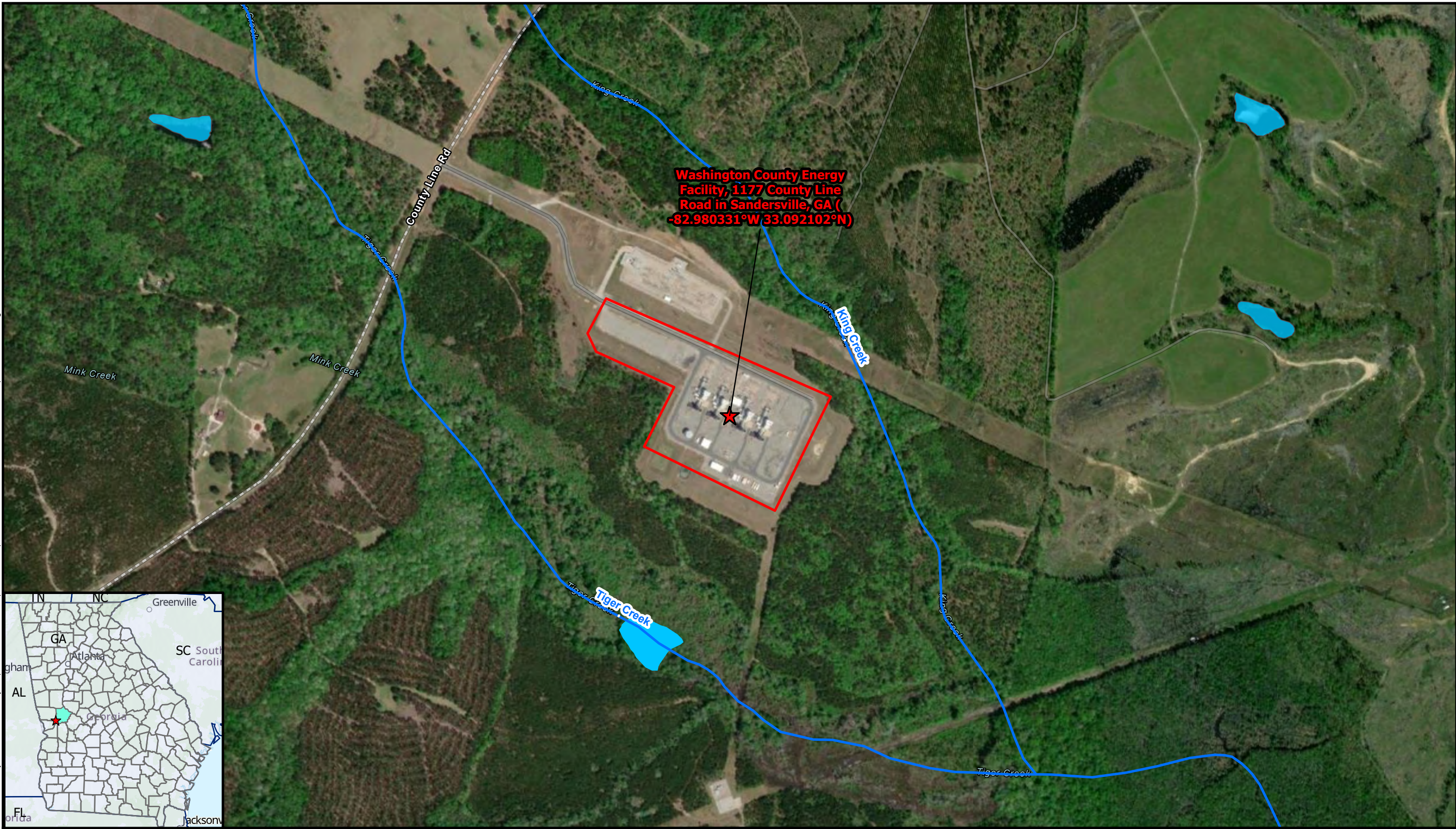


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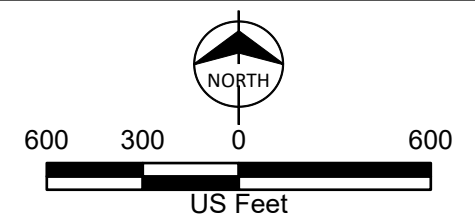
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



May 12, 2023
Mr. Bill Wikoff
Supervisory Biologist
U.S. Fish and Wildlife Services, Georgia Ecological Services
4890 Wildlife Drive NE
Townsend, GA 31331

Re: Oglethorpe Power Corporation
Washington Energy Facility Dual Fuel Conversion Project

Dear Mr Wikoff:

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Mr. Bill Wikoff
U.S. Fish and Wildlife Services, Georgia Ecological Services
May 12, 2023
Page 2

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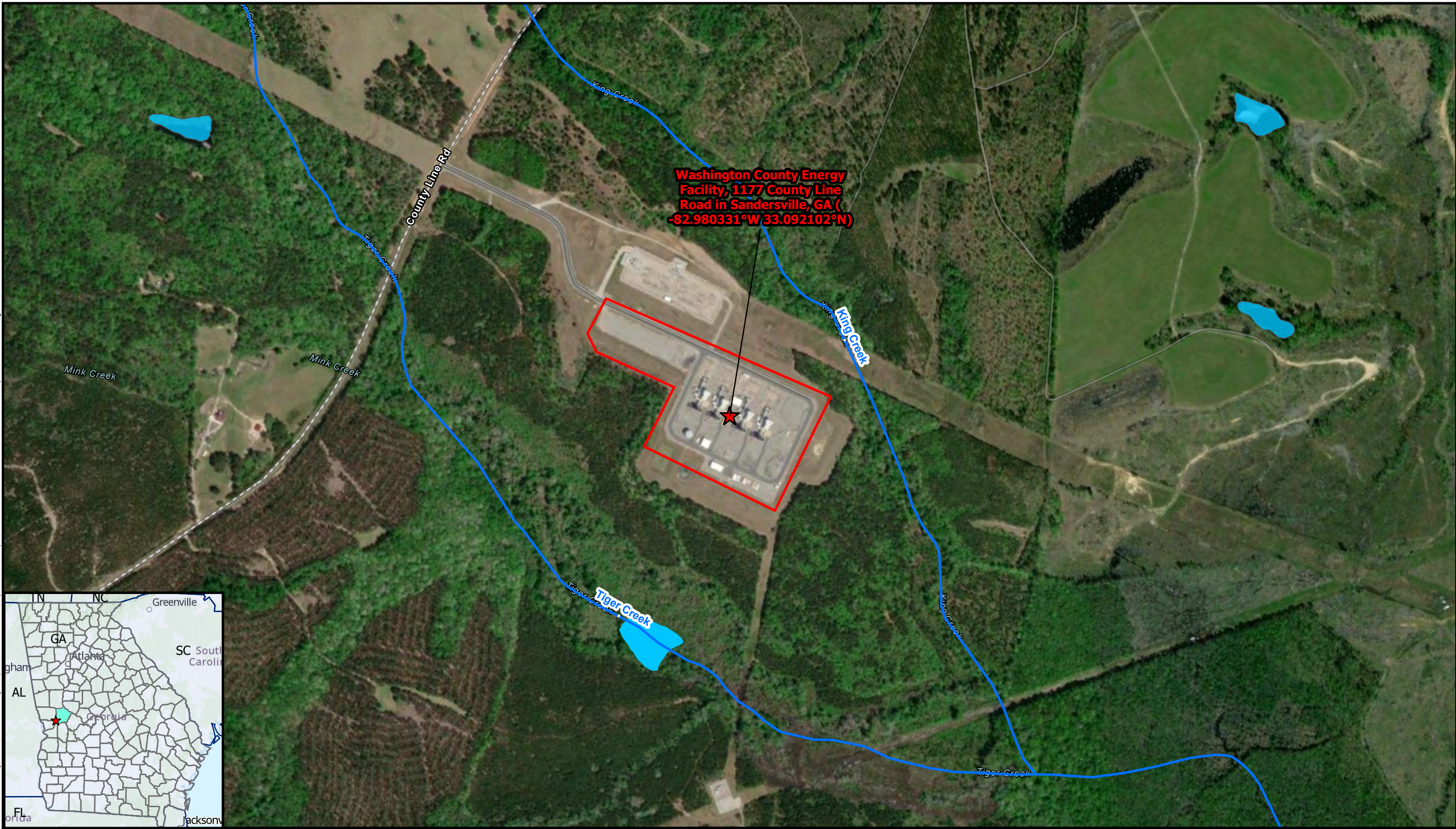
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Sara Kent
Burns & McDonnell, Project Manager

Enclosure Attachment

ATTACHMENT – PROJECT MAPS

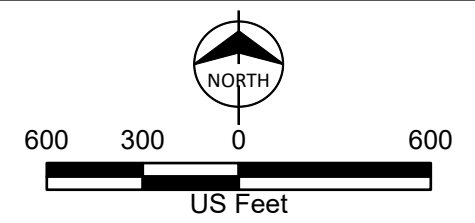
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Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



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- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Kristian Poncho
Tribal Historic Preservation Officer
Coushatta Tribe of Louisiana
P.O. Box 10
Elton, LA 70532

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Oglethorpe Power Corporation (Oglethorpe) plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will be using the NPA to obligate funds before completing Section 106.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

USDA is an equal opportunity provider and employer.

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than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Oglethorpe proposes that the APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. The geographic scope of the APE will not be final until a determination is made by RUS pursuant to 36 CFR § 800.4(a)(1). Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its RE Act program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Oglethorpe is notifying you about the referenced project because of the possible interest of the Coushatta Tribe of Louisiana in Washington County, Georgia. Should the Coushatta Tribe of Louisiana elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced

project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Greg Korosec at Gregory.Korosec@usda.gov.

Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

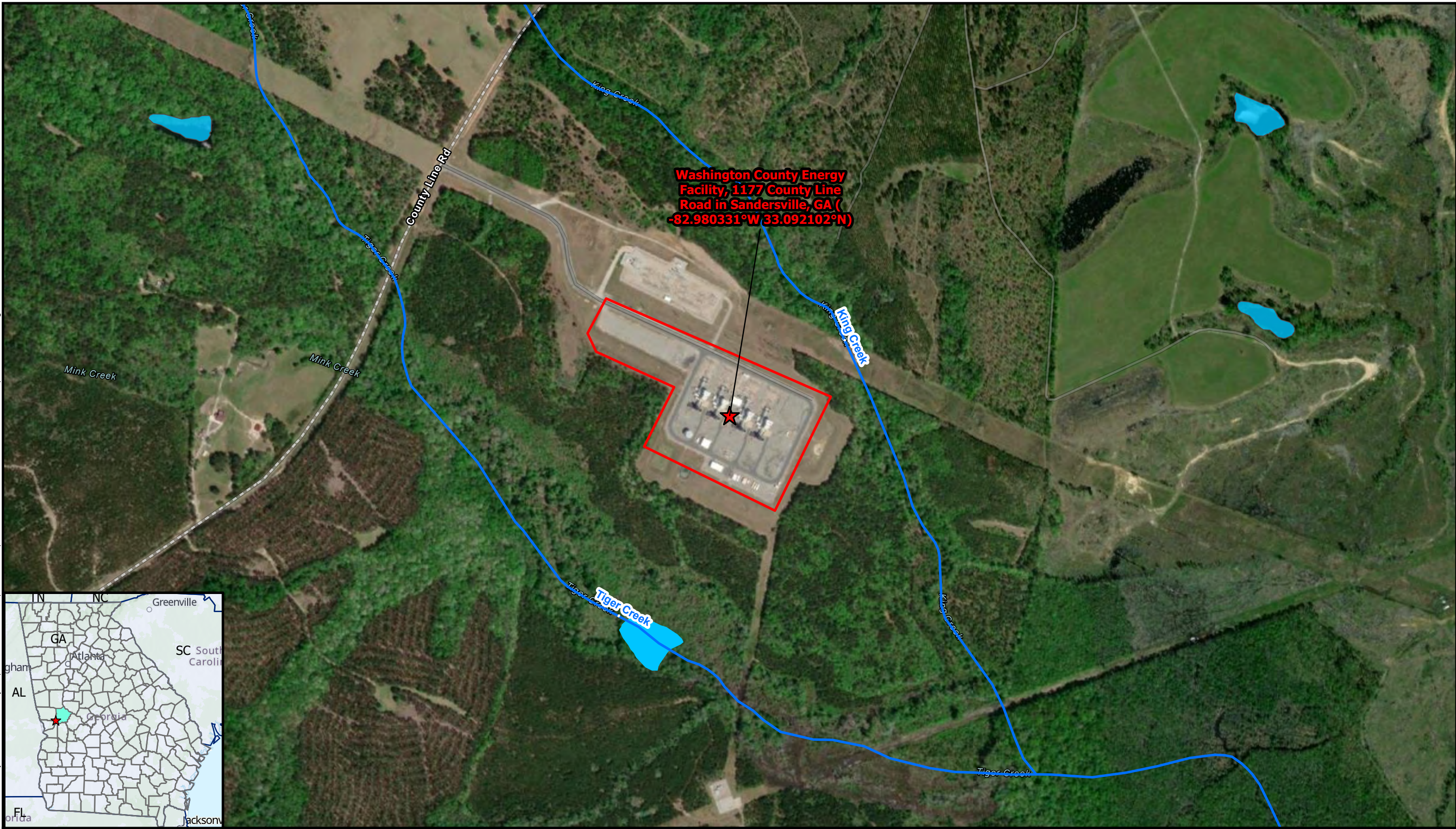


Enclosure Attachment

CC kponcho@coushatta.org

ATTACHMENT – PROJECT MAPS

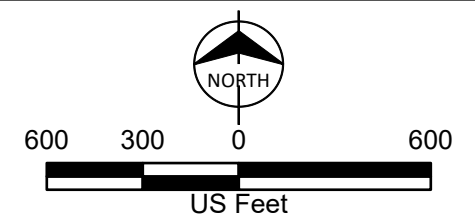
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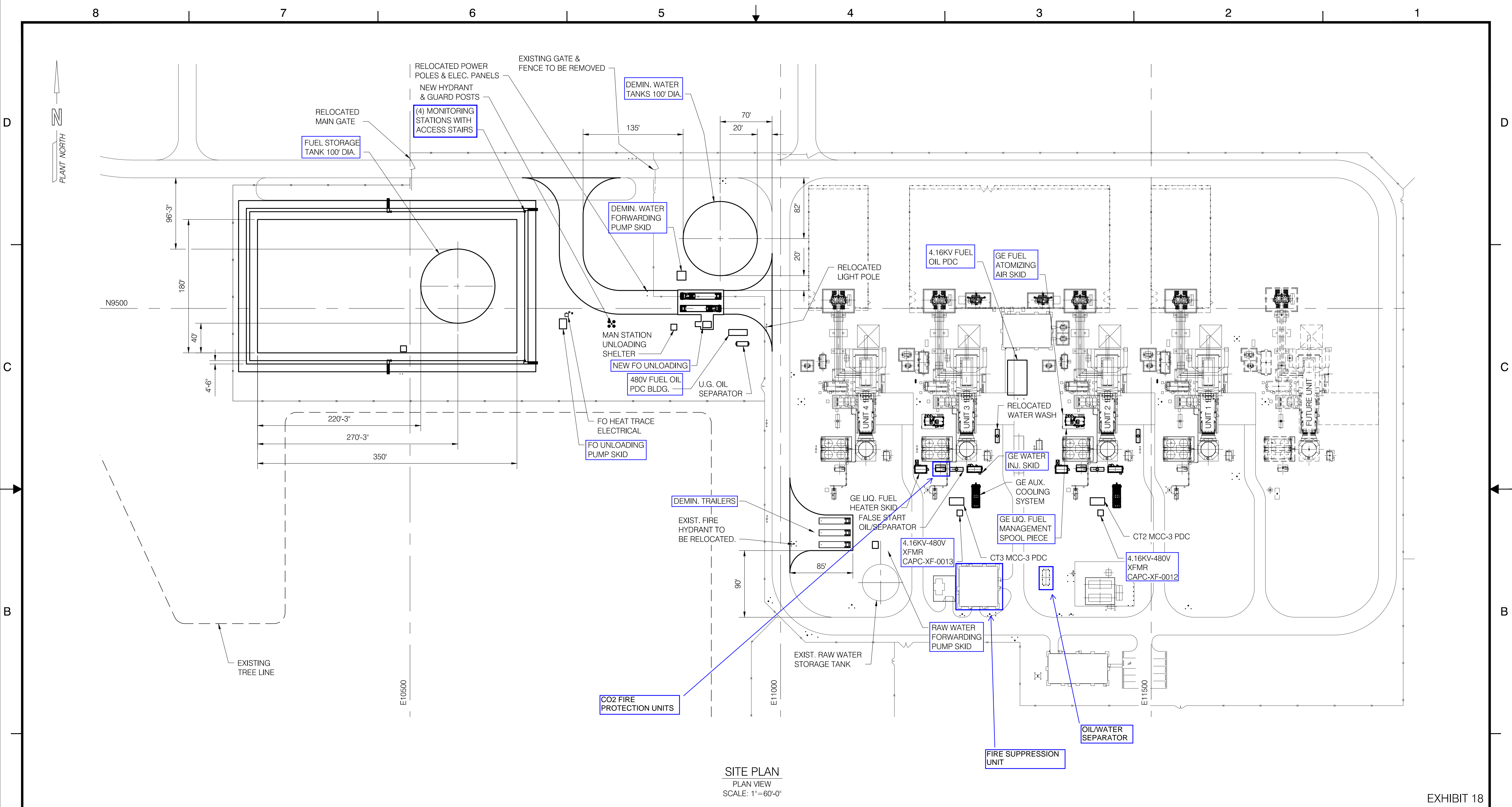
Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
 PLAN VIEW
 SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
D	XXXXX	XX/XX/XX	XXX	XXX	XXX
C	XXXXX	XX/XX/XX	XXX	XXX	XXX
B	XXXXX	XX/XX/XX	XXX	XXX	XXX
A	XXXXX	XX/XX/XX	XXX	XXX	XXX

CLIENT INFORMATION/LOGO				

APPROVALS	
APPROVED:	X.X.XXXXXXXXXX
DATE:	XX/XX/XX
DRAWN:	R.W.MANTOOTH
CHECKED:	X.X.XXXXXXXXXX
PROJ ENGR:	X.X.XXXXXXXXXX
PROJ MGR:	X.X.XXXXXXXXXX
GENERAL TOLERANCES	
TOLERANCE UNITS: INCHES	
TOLERANCES UNLESS SPECIFIED OTHERWISE:	
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FRACTIONS: ± 1/8	

PROFESSIONAL ENGINEER'S SEAL

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Mesa Associates, Inc.
Engineers and Consultants
 480 PRODUCTION AVENUE | MADISON, AL 35758 | (256) 258-2100

MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. David Cook
Tribal Administrator
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Cook:

Oglethorpe Power Corporation (Oglethorpe) plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will be using the NPA to obligate funds before completing Section 106.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing

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Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

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Oglethorpe is notifying you about the referenced project because of the possible interest of the Kialegee Tribal Town in Washington County, Georgia. Should the Kialegee Tribal Town elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

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Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

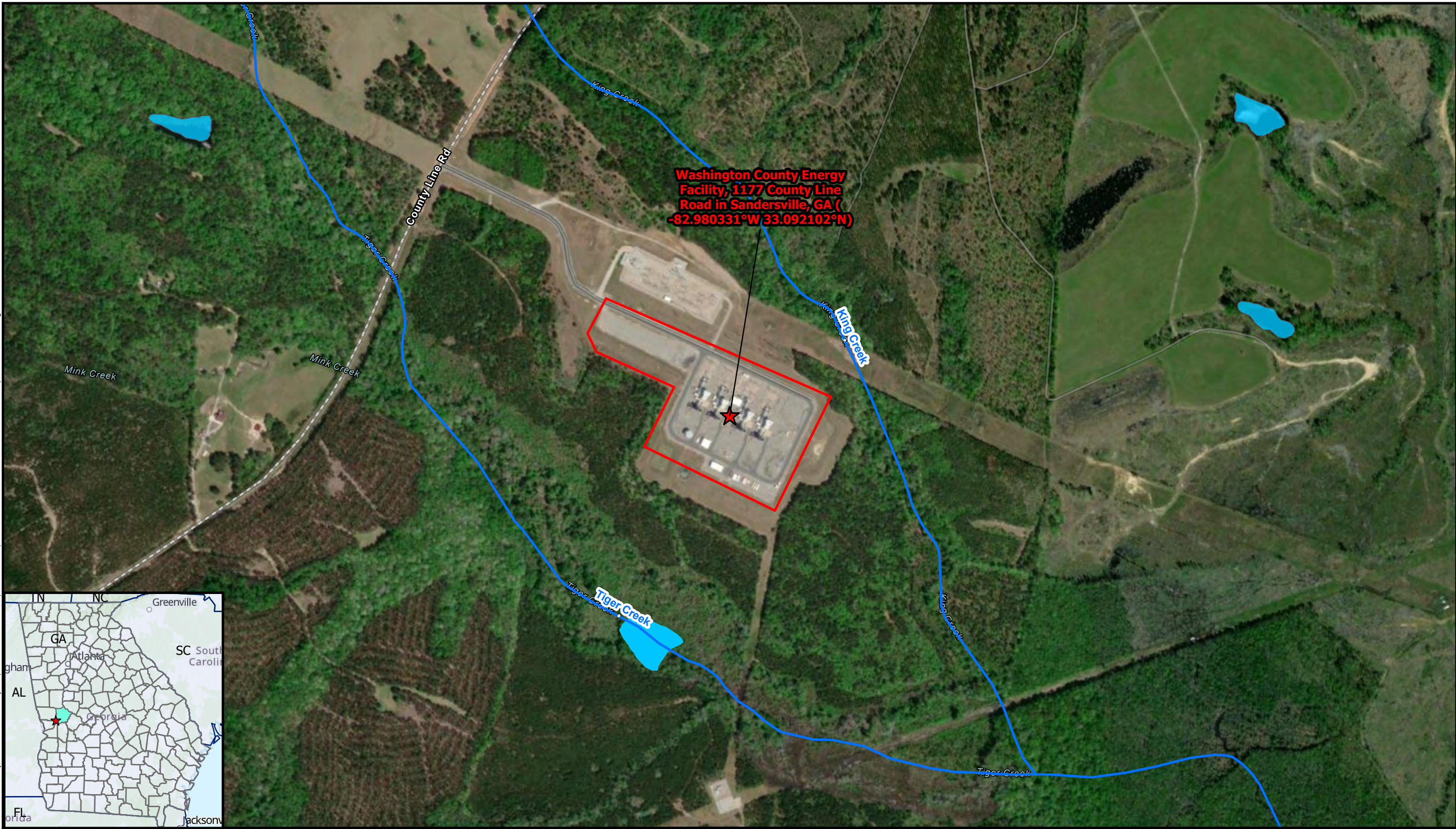


Enclosure Attachment

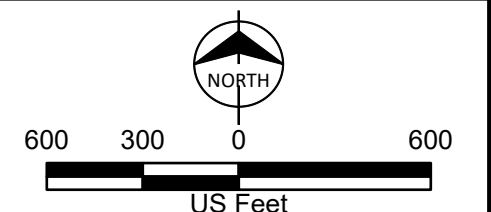
CC david.cook@kialegetribe.net

ATTACHMENT – PROJECT MAPS

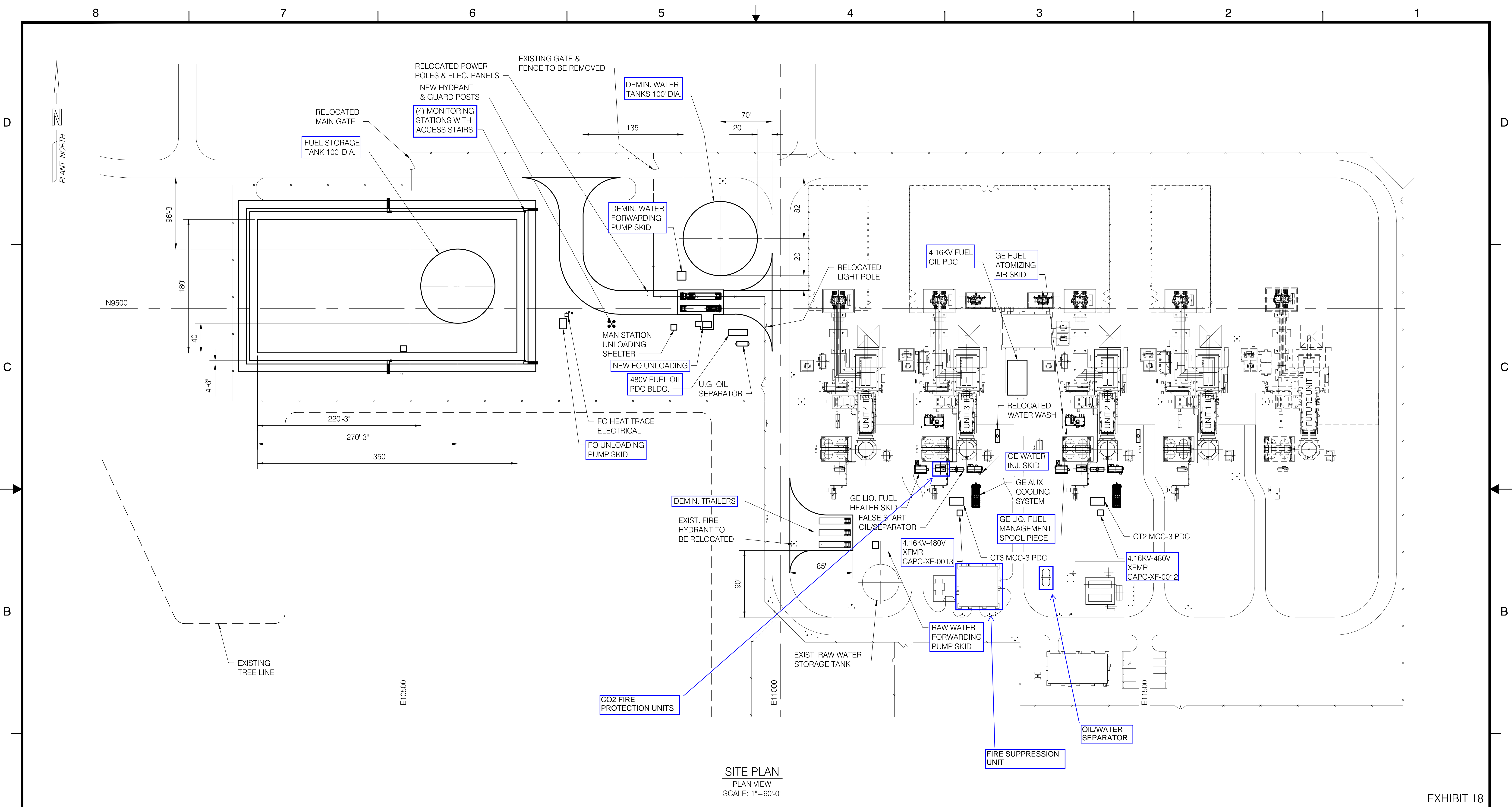
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

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OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Turner Hunt
Tribal Historic Preservation Officer
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Hunt:

Oglethorpe Power Corporation (Oglethorpe) plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will be using the NPA to obligate funds before completing Section 106.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

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Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

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Oglethorpe is notifying you about the referenced project because of the possible interest of the Muscogee (Creek) Nation in Washington County, Georgia. Should the Muscogee (Creek) Nation elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

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Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

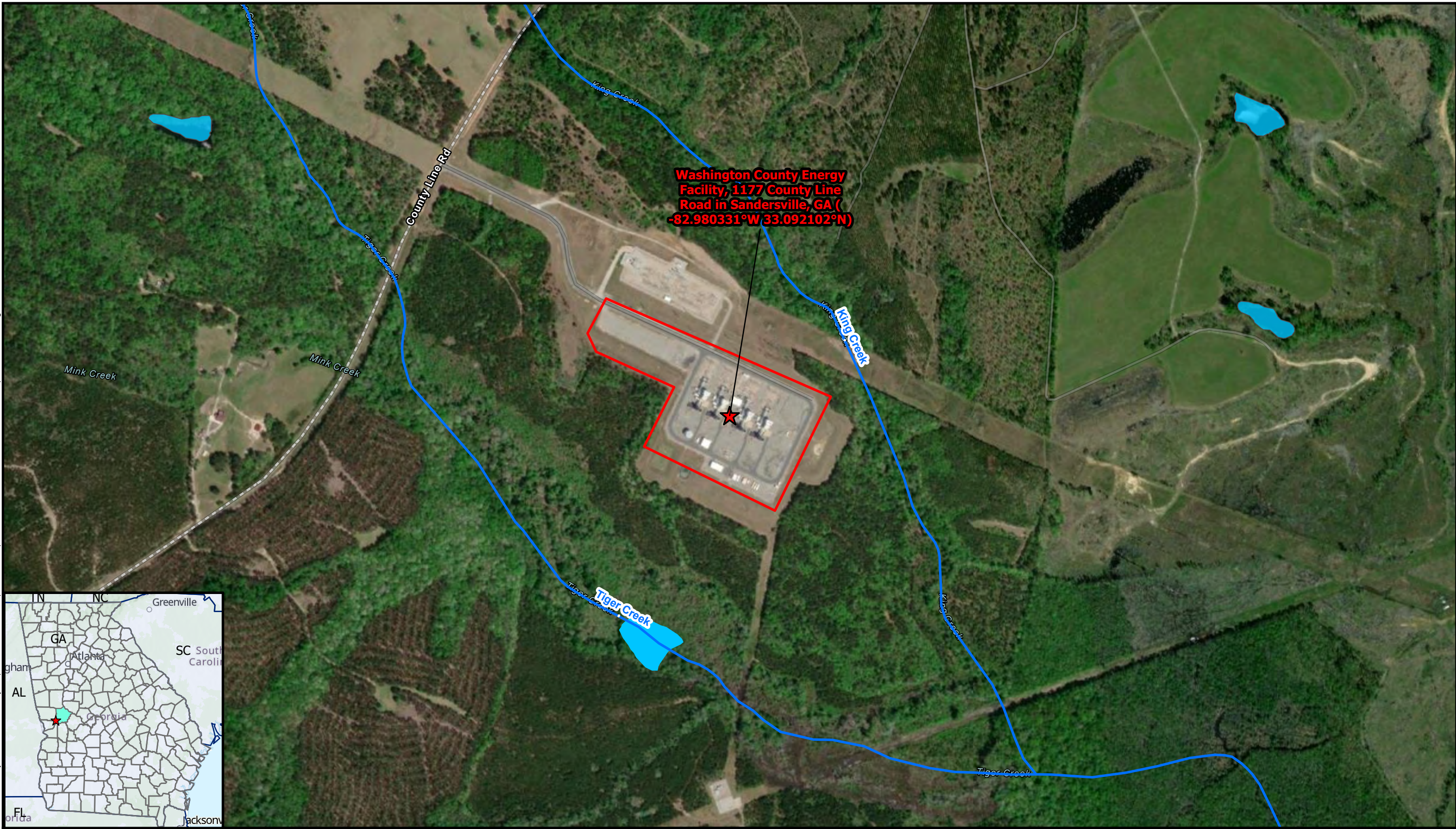


Enclosure Attachment

CC section106@mcn-nsn.gov
thunt@muscogeenation.com





ATTACHMENT – PROJECT MAPS

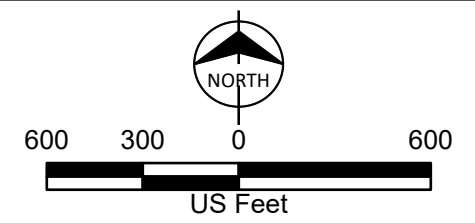
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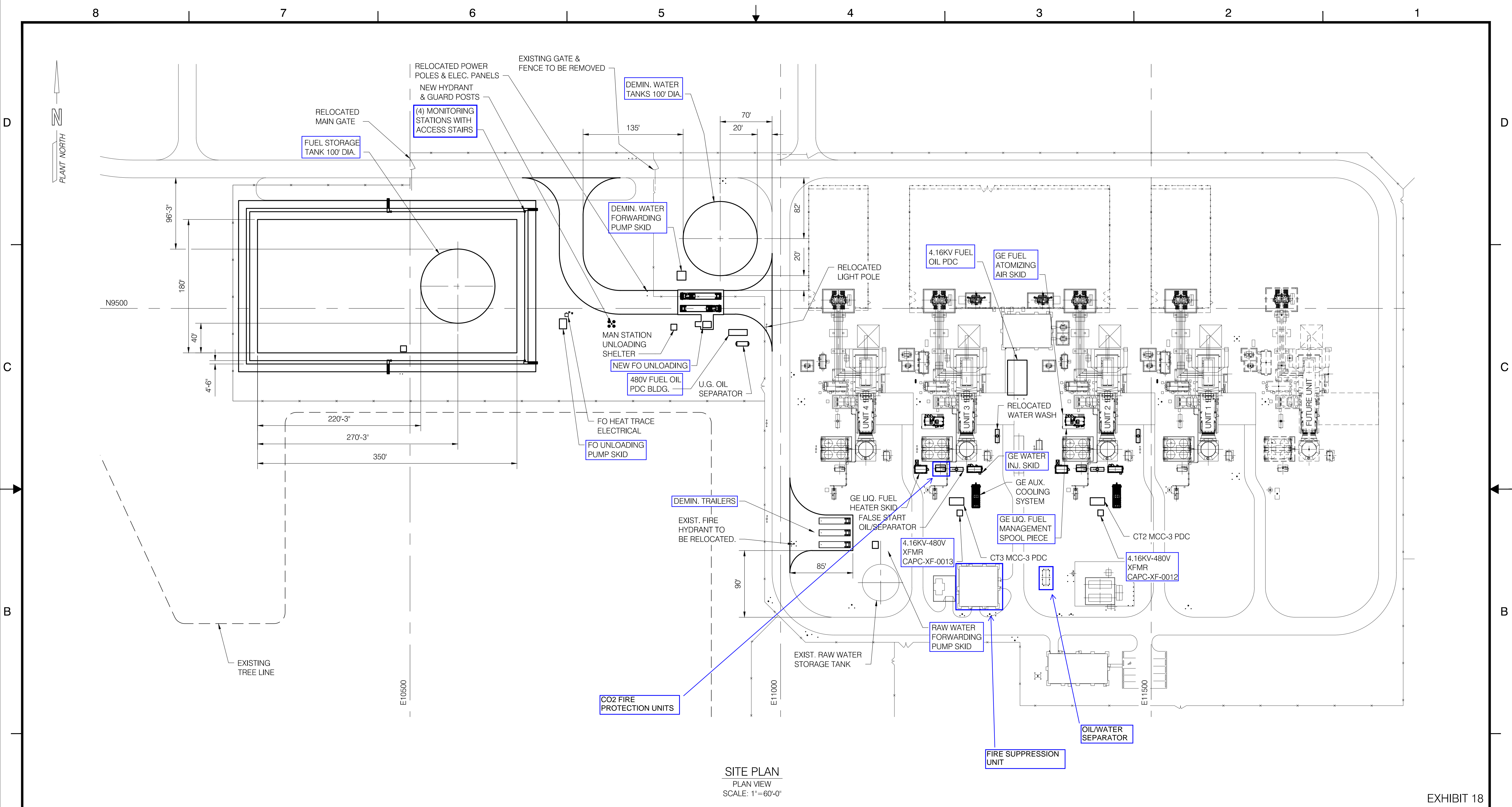
Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



-  Washington County Energy Facility
-  Property Boundary
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

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CLIENT INFORMATION/LOGO				

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APPROVED:	X.X.XXXXXXXXXX
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Mesa Associates, Inc.
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OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Randall Hicks
Council Representative
Muscogee (Creek) Nation National Council
P.O. Box 158
Okmulgee, OK 74447

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its RE Act program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Oglethorpe is notifying you about the referenced project because of the possible interest of the Muscogee (Creek) Nation National Council in Washington County. Should the Muscogee (Creek) Nation National Council elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Greg Korosec at Gregory.Korosec@usda.gov.

Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

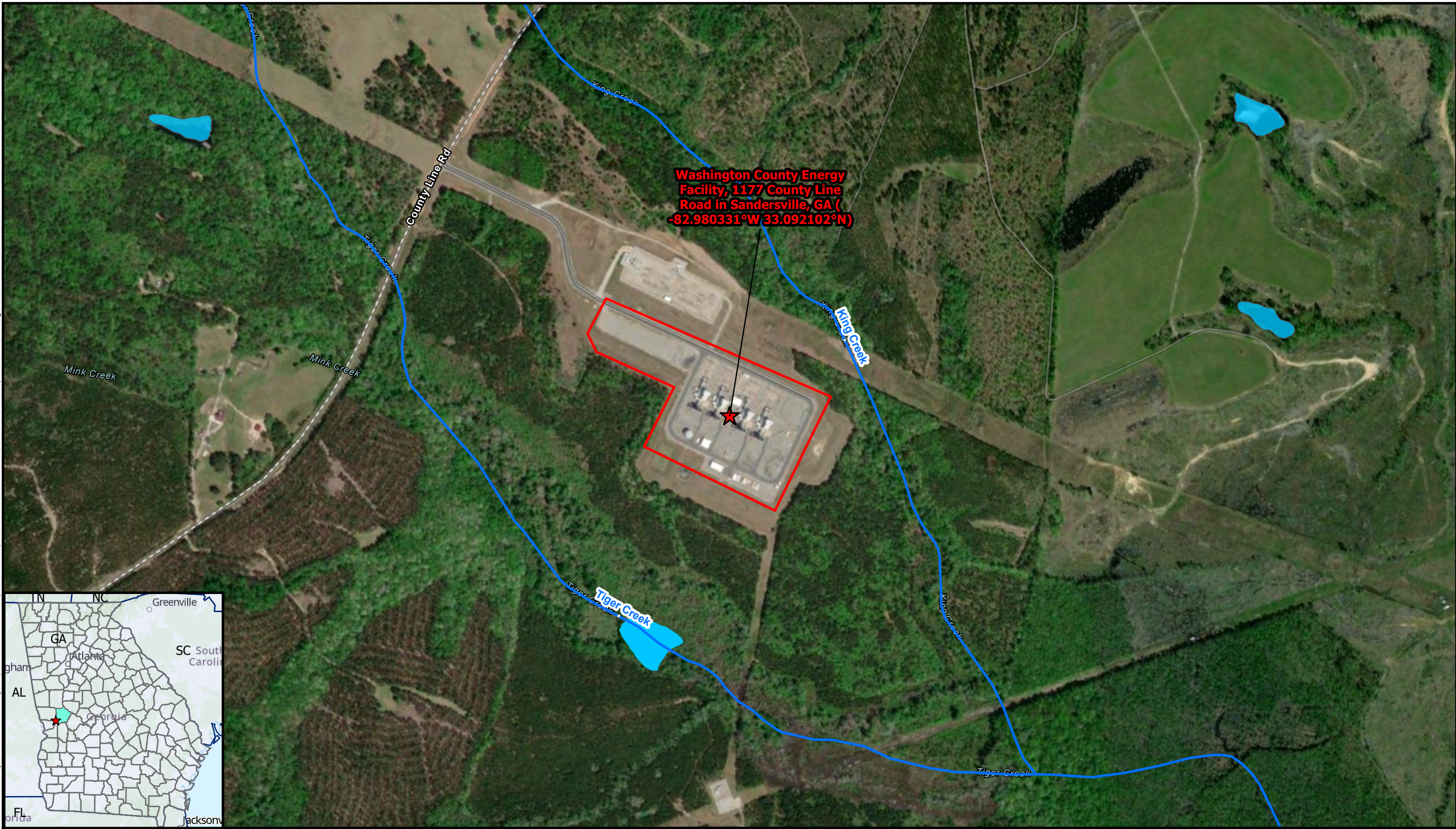


Enclosure Attachment

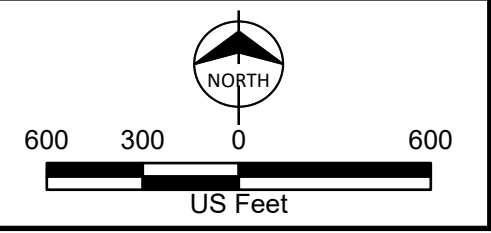
CC rhicks@mcnnc.com

ATTACHMENT – PROJECT MAPS

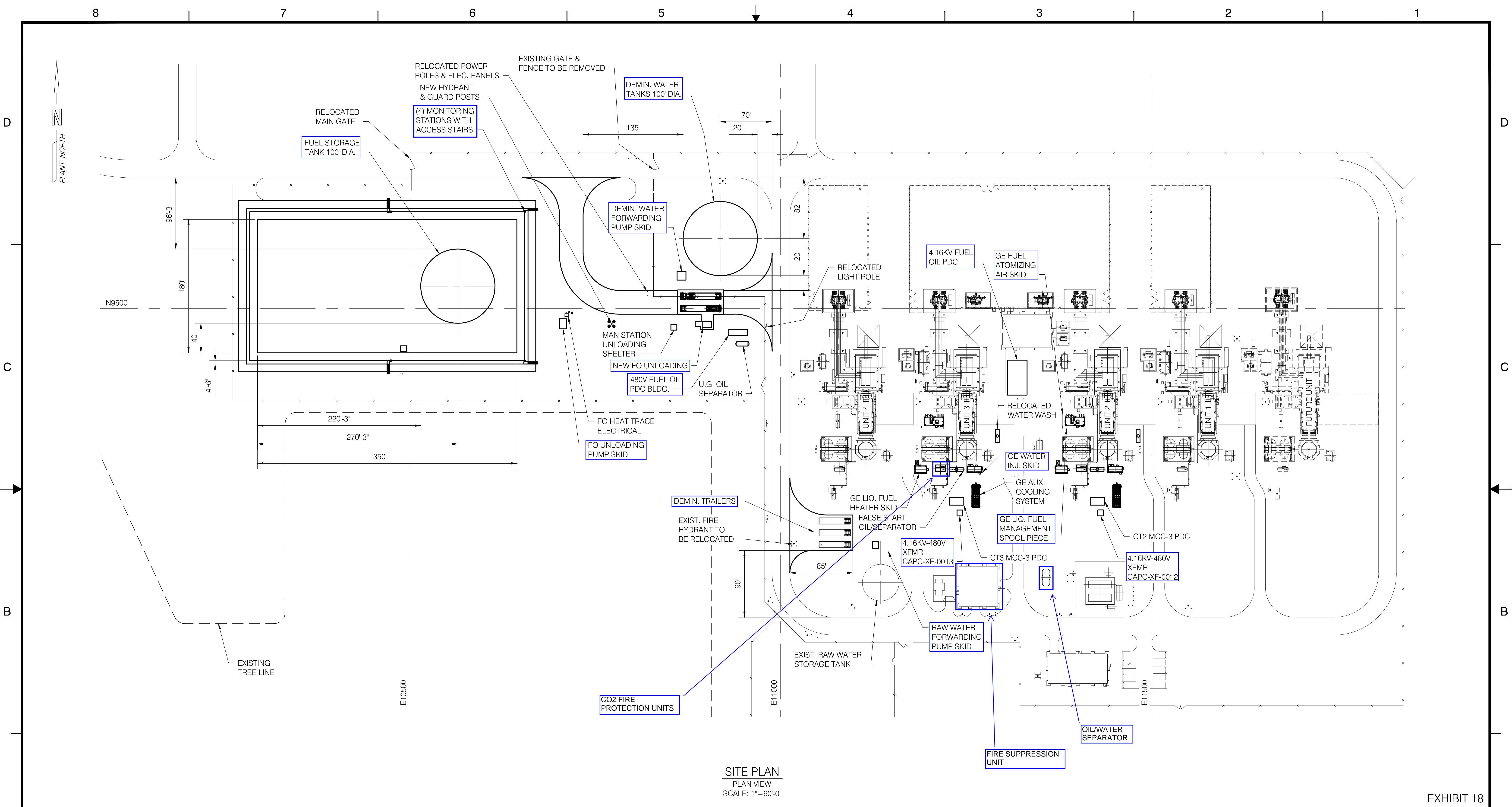
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- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
D	XXXXX	XX/XX/XX	XXX	XXX	XXX
C	XXXXX	XX/XX/XX	XXX	XXX	XXX
B	XXXXX	XX/XX/XX	XXX	XXX	XXX
A	XXXXX	XX/XX/XX	XXX	XXX	XXX

CLIENT INFORMATION/LOGO				

APPROVALS	
APPROVED:	X.X.XXXXXXXXXX
DATE:	XX/XX/XX
DRAWN:	R.W.MANTOOTH
CHECKED:	X.X.XXXXXXXXXX
PROJ ENGR:	X.X.XXXXXXXXXX
PROJ MGR:	X.X.XXXXXXXXXX
GENERAL TOLERANCES	
TOLERANCE UNITS: INCHES	
TOLERANCES UNLESS SPECIFIED OTHERWISE:	
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3 PLACE DECIMALS:	± .025
4 PLACE DECIMALS:	± .0025
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FRACTIONS: ± 1/8	

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Mesa Associates, Inc.
Engineers and Consultants

480 PRODUCTION AVENUE | MADISON, AL 35758 | (256) 258-2100

MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Larry Haikey
Tribal Historic Preservation Officer
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Haikey:

Oglethorpe Power Corporation (Oglethorpe) plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will be using the NPA to obligate funds before completing Section 106.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing

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Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

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Oglethorpe is notifying you about the referenced project because of the possible interest of the Thlopthlocco Tribal Town in Washington County, Georgia. Should the Thlopthlocco Tribal Town elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

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Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

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Archaeologist
Rural Utilities Service, Rural Development, USDA

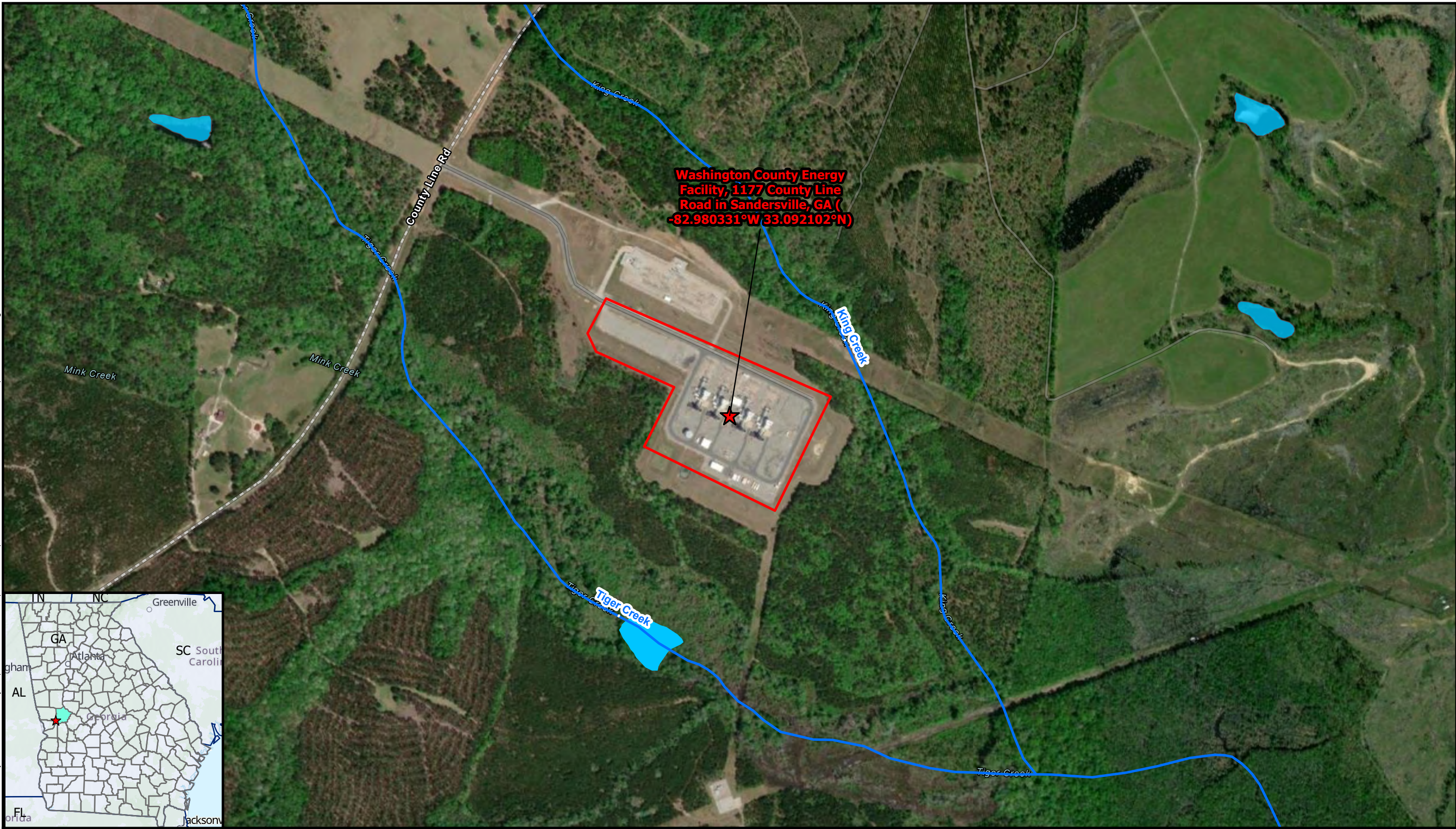


Enclosure Attachment

CC lhaikey@pci-nsn.gov

ATTACHMENT – PROJECT MAPS

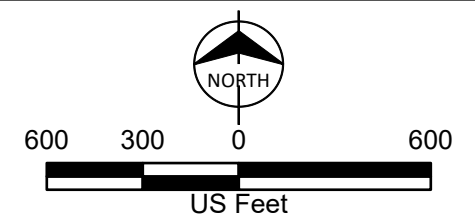
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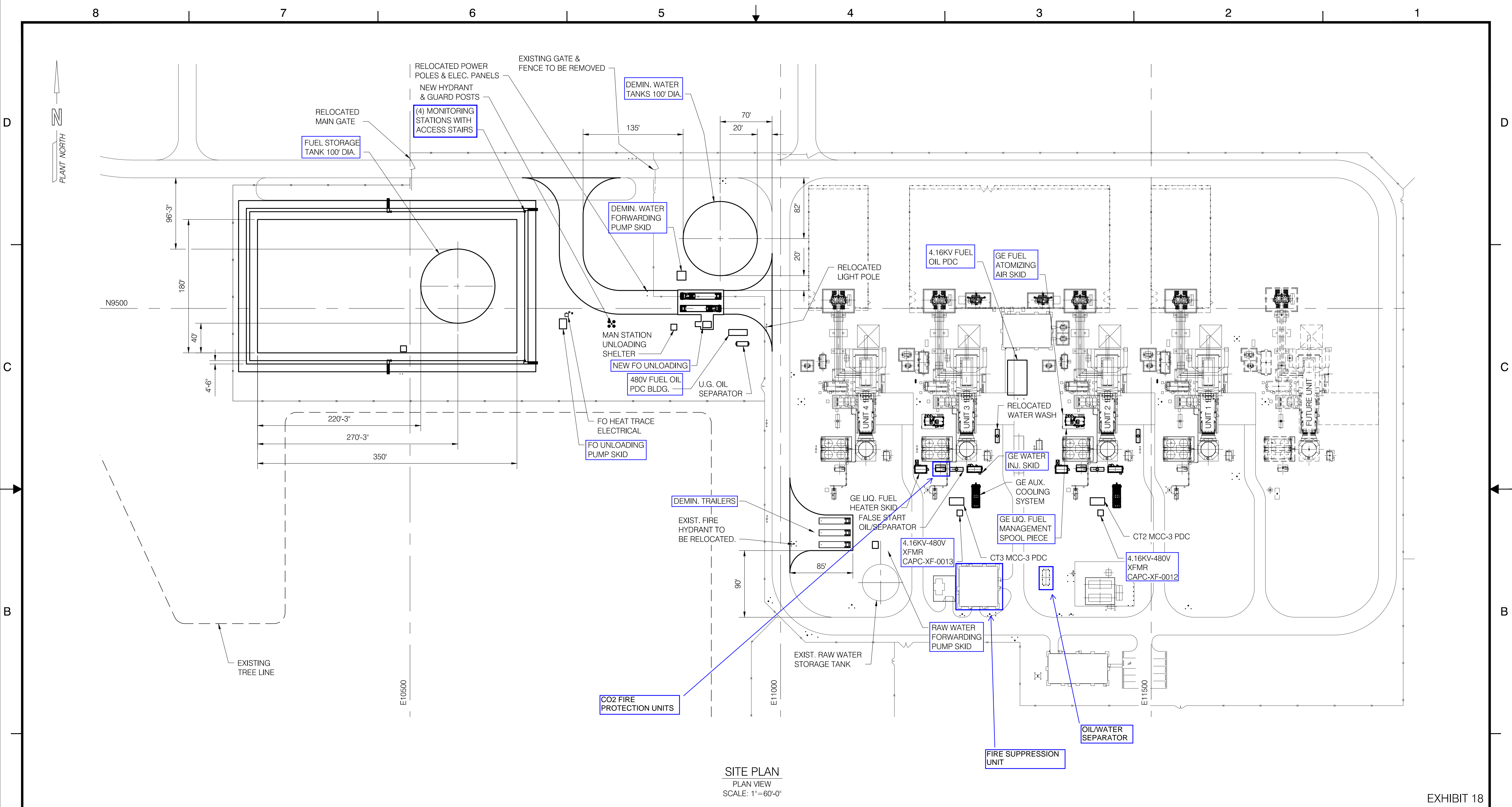
Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
 PLAN VIEW
 SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
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CLIENT INFORMATION/LOGO				

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MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Ben Yahola
Historic Preservation Officer
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Project

Dear Mr. Yahola:

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Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

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Oglethorpe is notifying you about the referenced project because of the possible interest of the Seminole Nation of Oklahoma in Washington County, Georgia. Should the Seminole Nation of Oklahoma elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

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Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

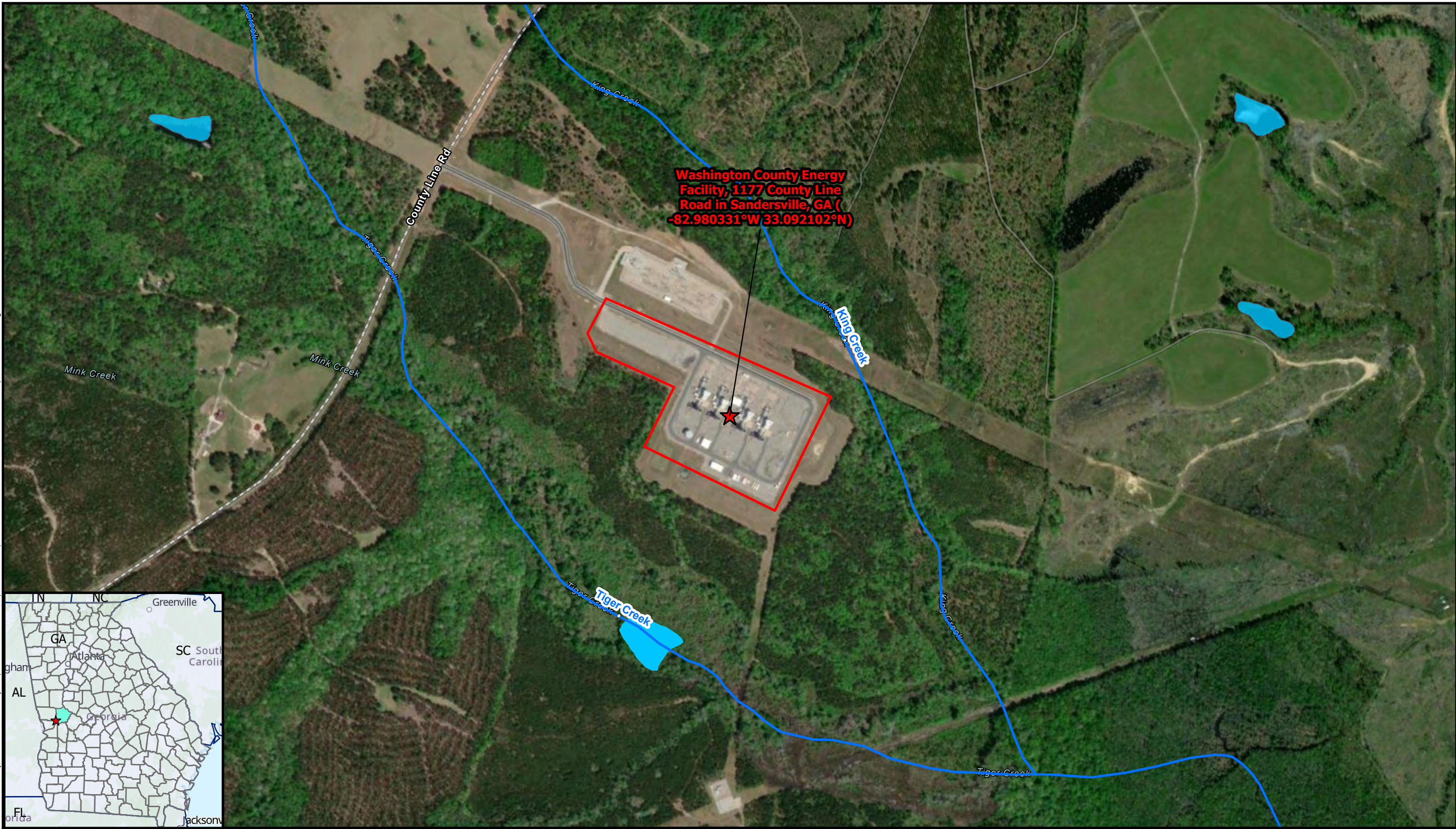


Enclosure Attachment

CC yahola.b@sno-nsn.gov

ATTACHMENT – PROJECT MAPS

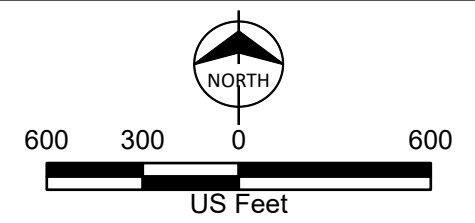
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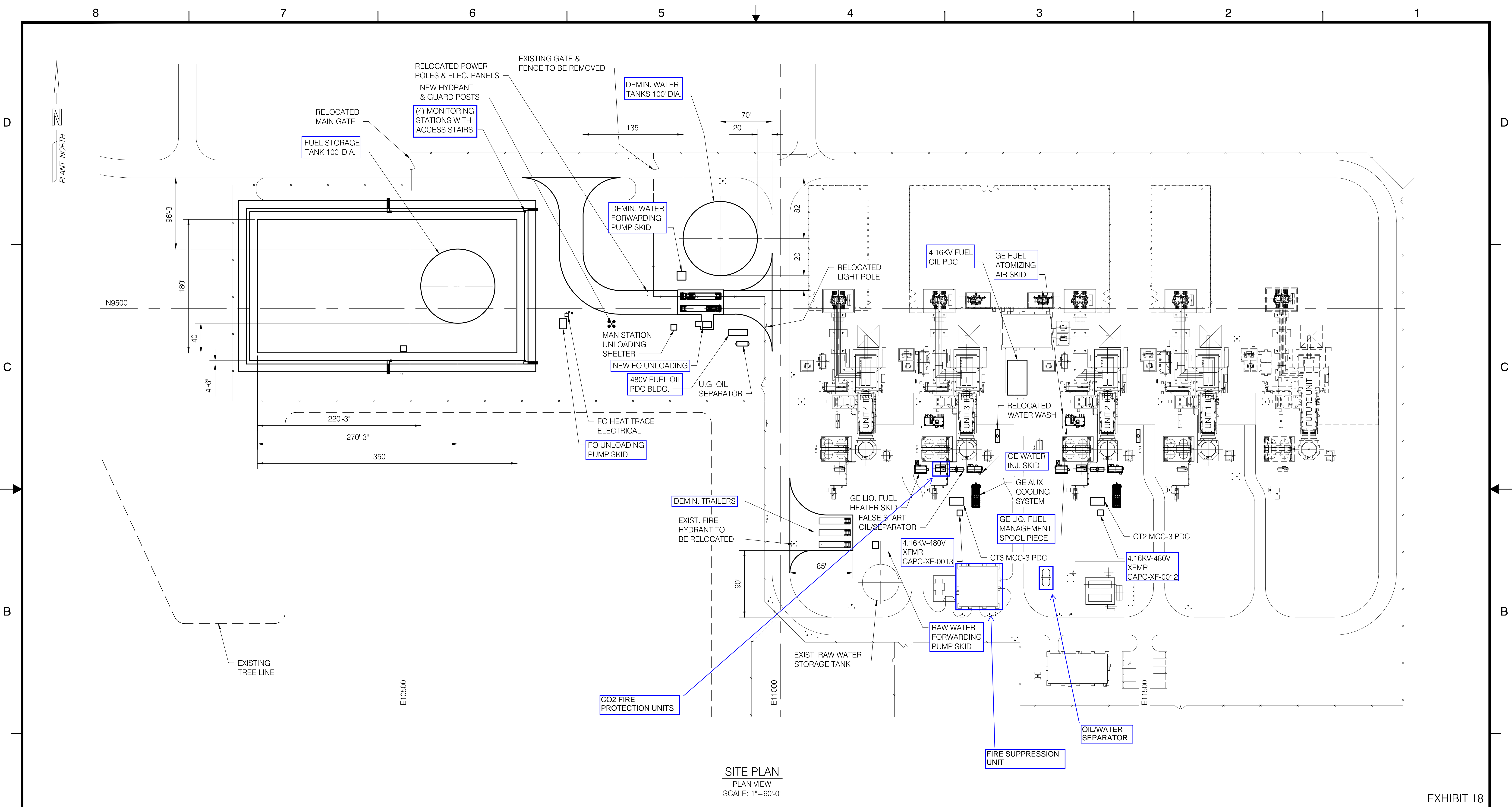
Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

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OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Dr. Paul Backhouse
Sr. Director of the Heritage and Environment Resource Office
Seminole Tribe of Florida
30290 Josie Billie Hwy PMB 1004
Clewiston, FL 33440

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Dr. Backhouse:

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In delegating this authority, RUS is advocating for the direct interaction between its RE Act program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Oglethorpe is notifying you about the referenced project because of the possible interest of the Seminole Tribe of Florida in Washington County, Georgia. Should the Seminole Tribe of Florida elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Greg Korosec at Gregory.Korosec@usda.gov.

Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

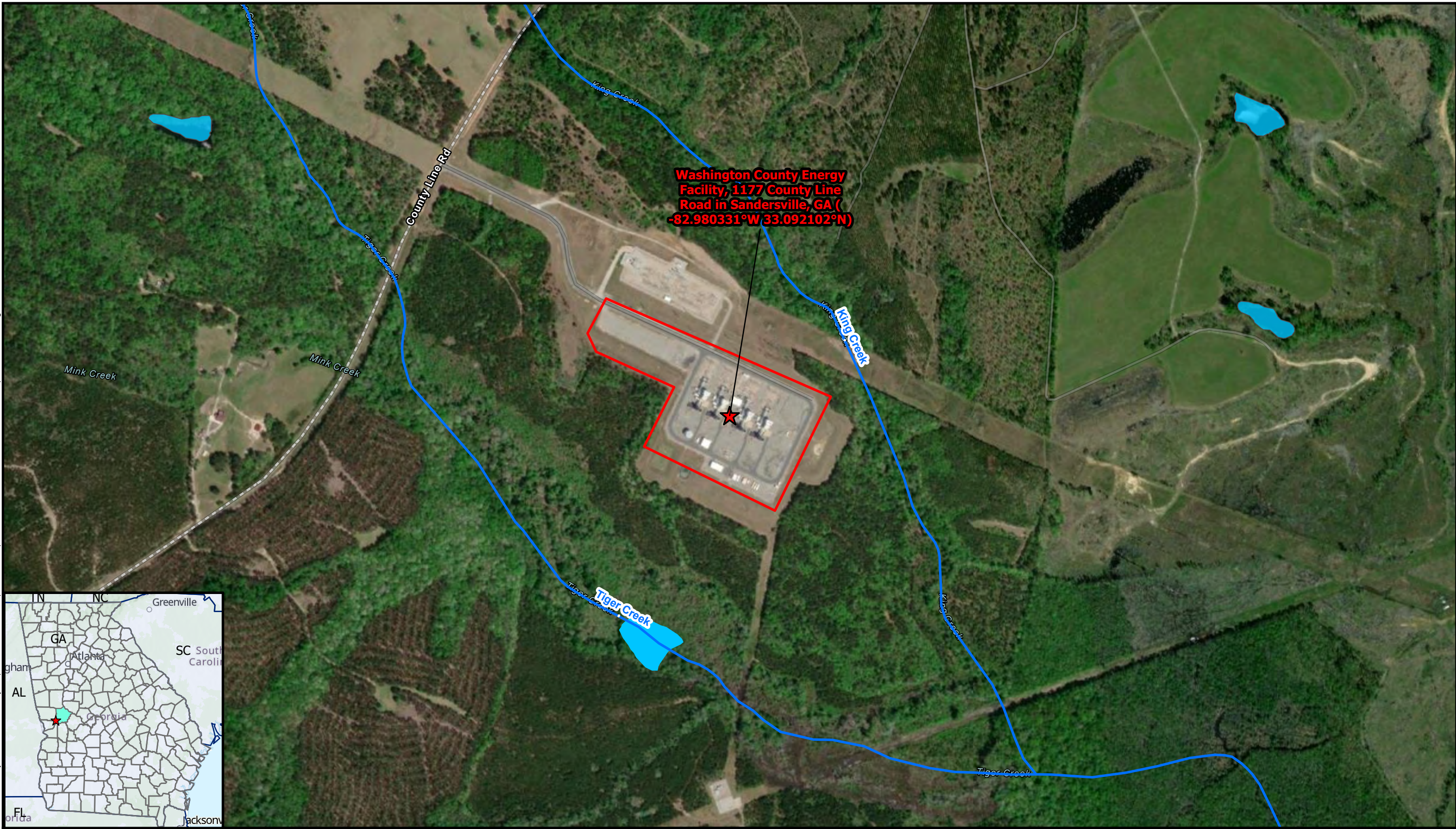


Enclosure Attachment

CC THPOCompliance@semtribe.com
paulbackhouse@semtribe.com

ATTACHMENT – PROJECT MAPS

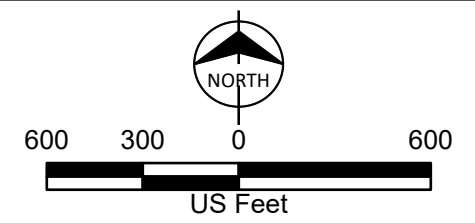
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METINASA, USGS, EPA, NPS, US Census Bureau, USDA



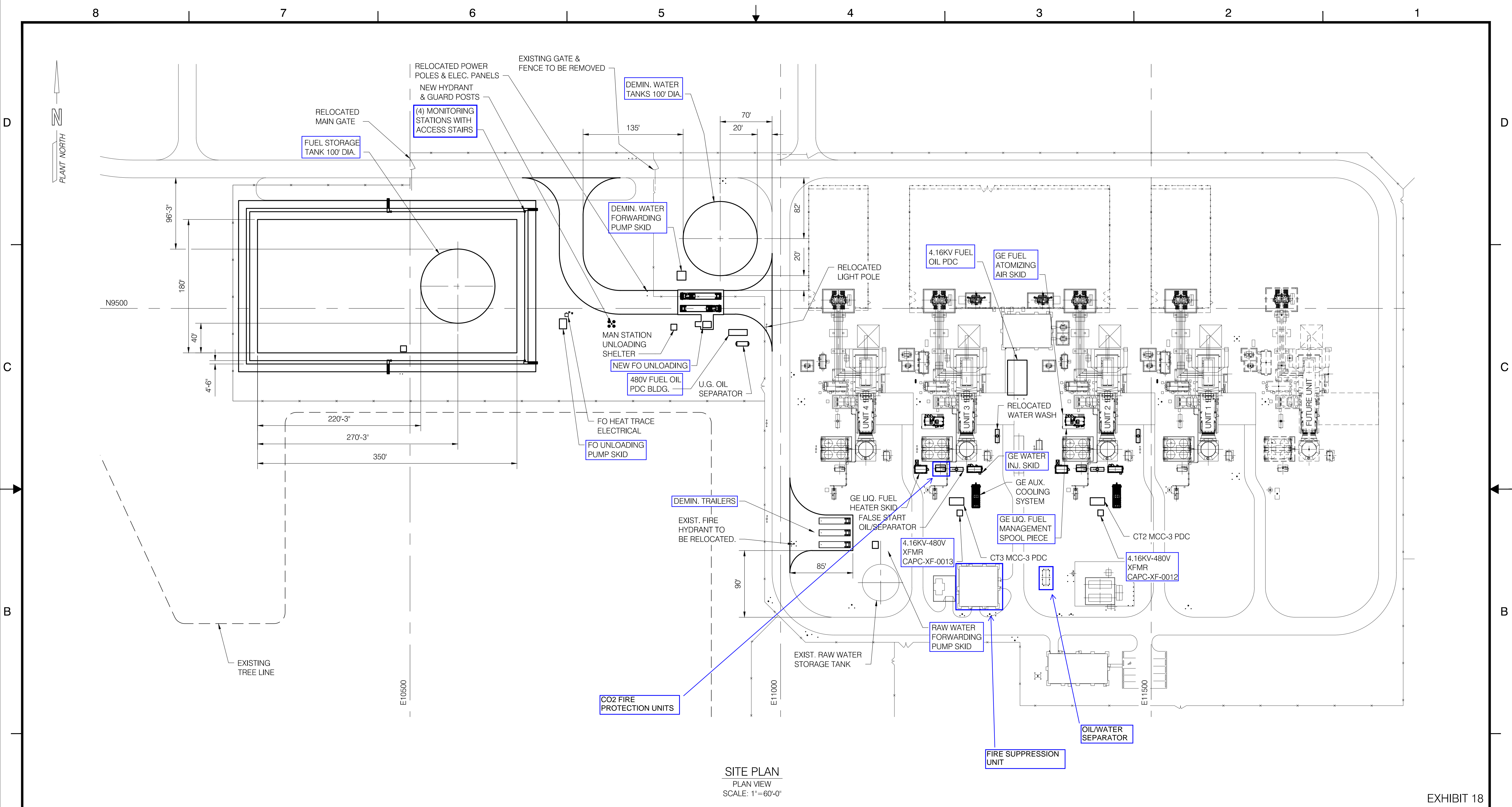
Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
D	XXXXX	XX/XX/XX	XXX	XXX	XXX
C	XXXXX	XX/XX/XX	XXX	XXX	XXX
B	XXXXX	XX/XX/XX	XXX	XXX	XXX
A	XXXXX	XX/XX/XX	XXX	XXX	XXX

CLIENT INFORMATION/LOGO				

APPROVALS	
APPROVED:	X.X.XXXXXXXXXX
DATE:	XX/XX/XX
DRAWN:	R.W.MANTOOTH
CHECKED:	X.X.XXXXXXXXXX
PROJ ENGR:	X.X.XXXXXXXXXX
PROJ MGR:	X.X.XXXXXXXXXX
GENERAL TOLERANCES	
TOLERANCE UNITS: INCHES	
TOLERANCES UNLESS SPECIFIED OTHERWISE:	
2 PLACE DECIMALS:	± .05
3 PLACE DECIMALS:	± .025
4 PLACE DECIMALS:	± .0025
ANGLES: ± 0.5°	
FRACTIONS: ± 1/8	

PROFESSIONAL ENGINEER'S SEAL

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Mesa Associates, Inc.
Engineers and Consultants

480 PRODUCTION AVENUE | MADISON, AL 35758 | (256) 258-2100

MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. David Frank
Tribal Historic Preservation Officer
Thlopthlocco Tribal Town
P.O. Box 188
Okenah, OK 74859

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Frank:

Oglethorpe Power Corporation (Oglethorpe) plans to seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will be using the NPA to obligate funds before completing Section 106.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing

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Facility in the event natural gas is curtailed or cut-off in times of heavy loads, and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

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Oglethorpe is notifying you about the referenced project because of the possible interest of the Thlopthlocco Tribal Town in Washington County, Georgia. Should the Thlopthlocco Tribal Town elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

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Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

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Rural Utilities Service, Rural Development, USDA

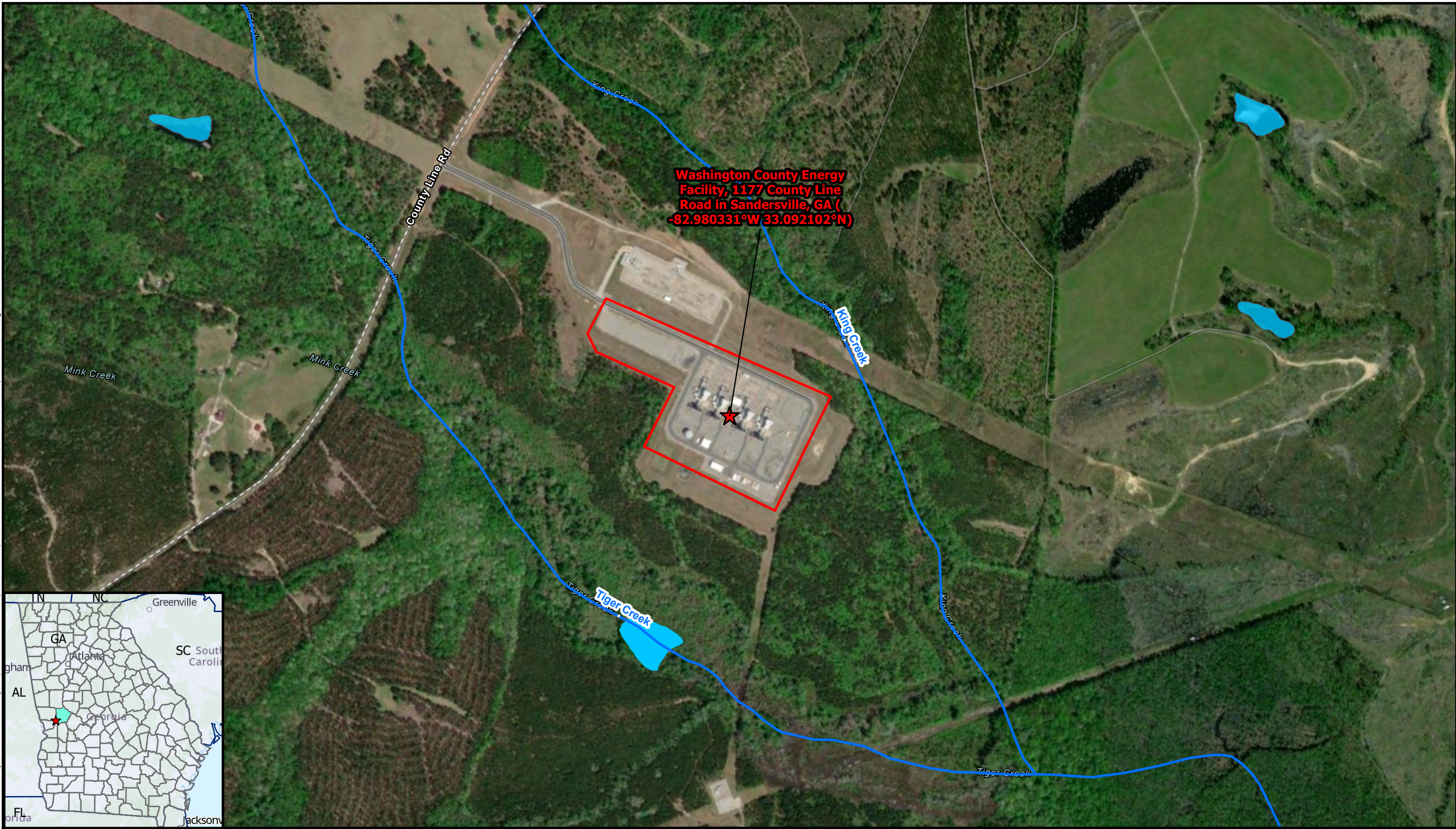


Enclosure Attachment

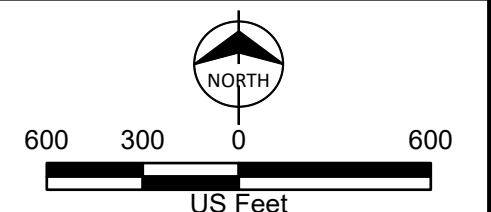
CC thpo@tttown.org

ATTACHMENT – PROJECT MAPS

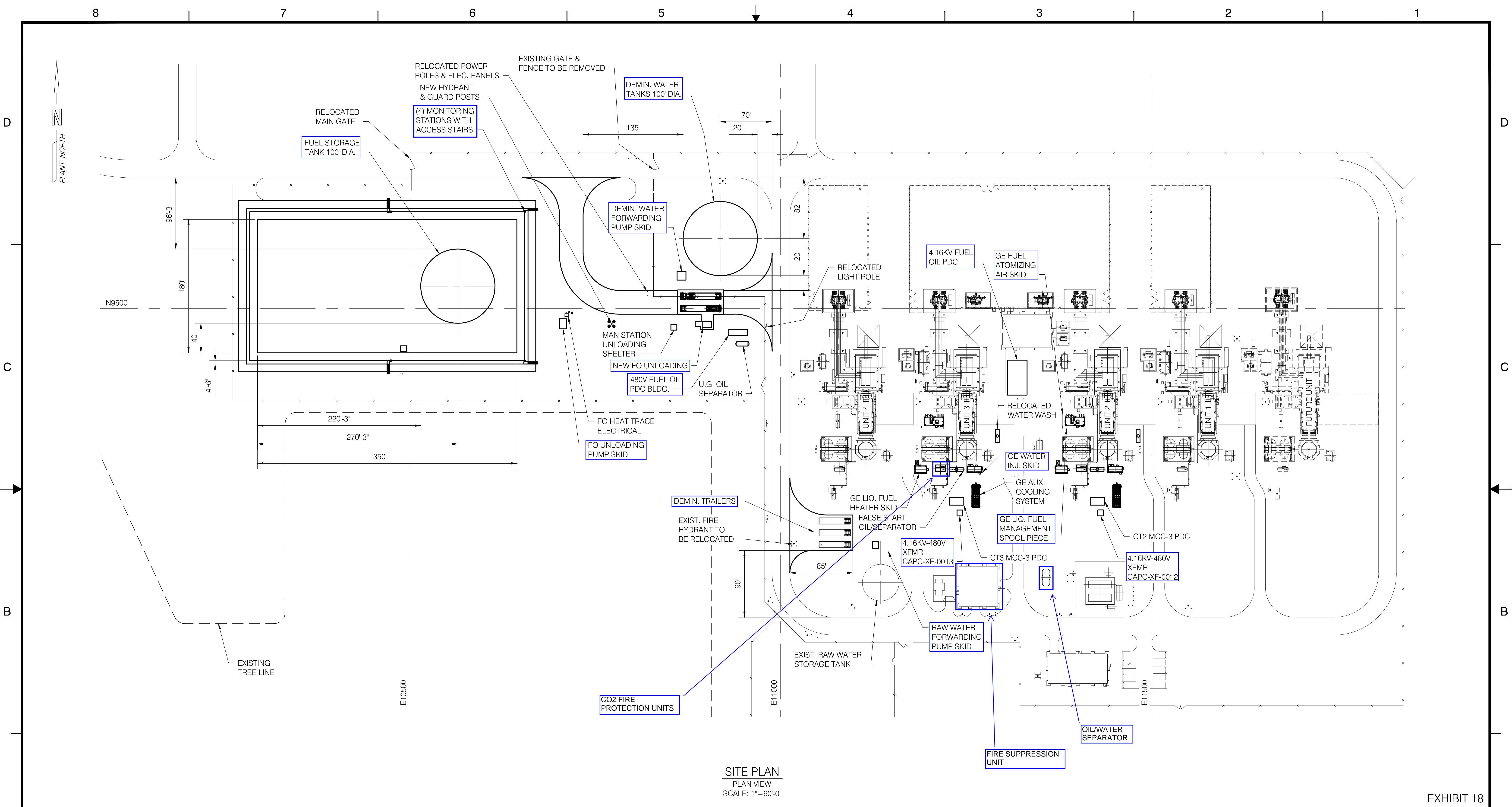
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



- ★ Washington County Energy Facility
- ▭ Property Boundary
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

					CLIENT INFORMATION/LOGO					APPROVALS APPROVED: X.X.XXXXXXXXXX DATE: XX/XX/XX DRAWN: R.W.MANTOOTH CHECKED: X.X.XXXXXXXXXX PROJ ENGR: X.X.XXXXXXXXXX PROJ MGR: X.X.XXXXXXXXXX			PROFESSIONAL ENGINEER'S SEAL 			MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN					
										GENERAL TOLERANCES TOLERANCE UNITS: INCHES TOLERANCES UNLESS SPECIFIED OTHERWISE: 2 PLACE DECIMALS: ± .05 ANGLES: ± 0.5° 3 PLACE DECIMALS: ± .025 FRACTIONS: ± 1/8 4 PLACE DECIMALS: ± .0025			THIS DRAWING CONTAINS PROPRIETARY INFORMATION WHICH IS TO BE HELD CONFIDENTIAL AND MAY NOT BE REPRODUCED OR DISCLOSED TO OTHERS WITHOUT THE PRIOR WRITTEN CONSENT OF MESA ASSOCIATES, INC. OR DULY AUTHORIZED REPRESENTATIVE THEREOF.			 Engineers and Consultants 480 PRODUCTION AVENUE MADISON, AL 35758 (256) 258-2100			SCALE: 1"=60'-0" DRAWING NUMBER: 23378003-MD003-001 REV: D		
REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR																
D	XXXXX	XX/XX/XX	XXX	XXX	XXX																
C	XXXXX	XX/XX/XX	XXX	XXX	XXX																
B	XXXXX	XX/XX/XX	XXX	XXX	XXX																
A	XXXXX	XX/XX/XX	XXX	XXX	XXX																



6/27/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Mr. Turner Hunt
Tribal Historic Preservation Officer
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Applicant THPO Section 106 Initiation
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

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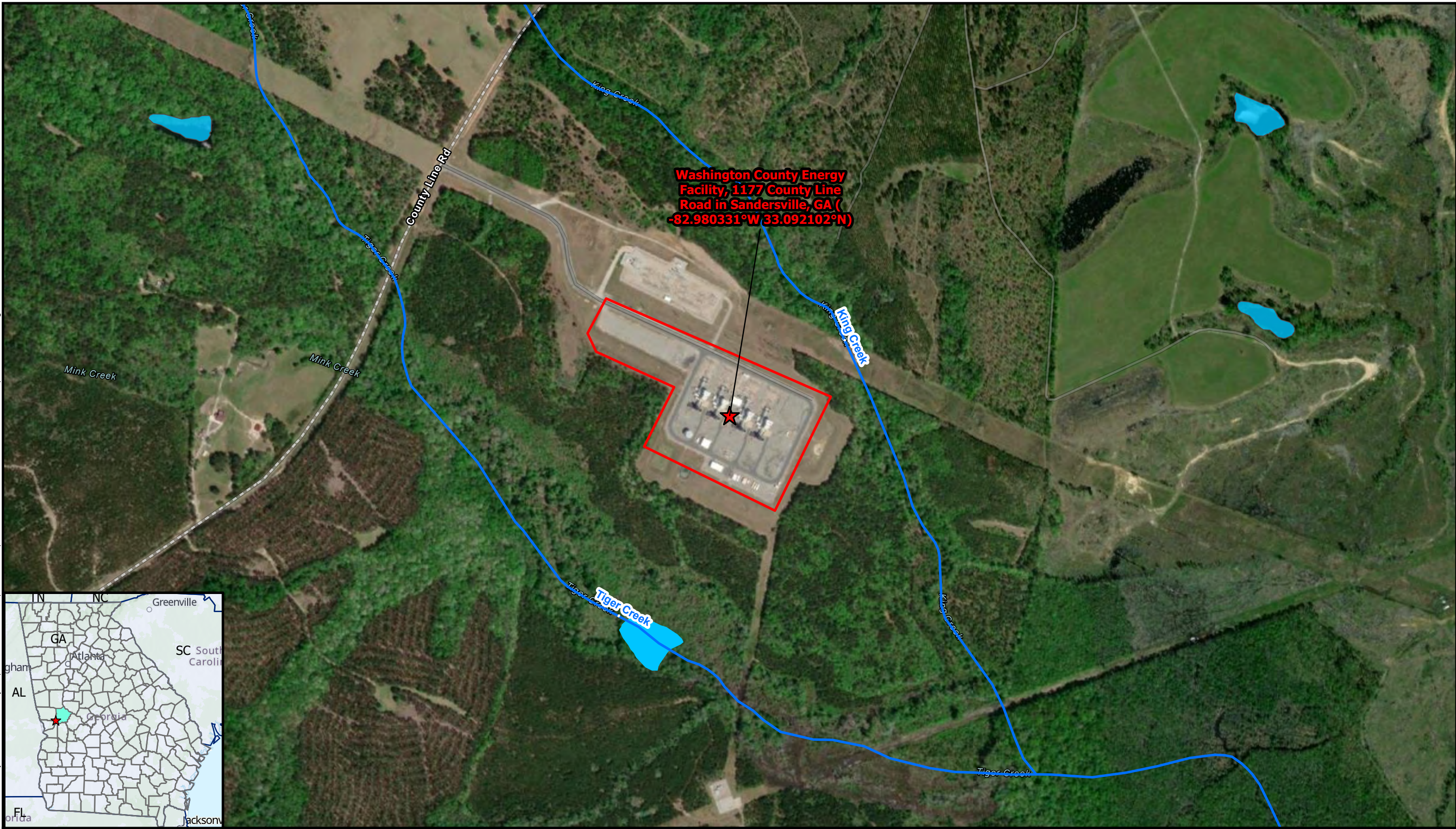


Enclosure Attachment

CC section106@mcn-nsn.gov
thunt@muscogeenation.com

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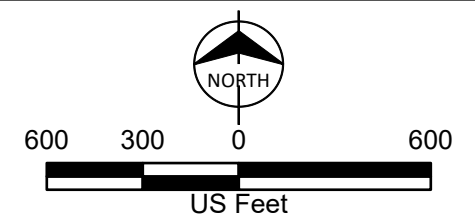
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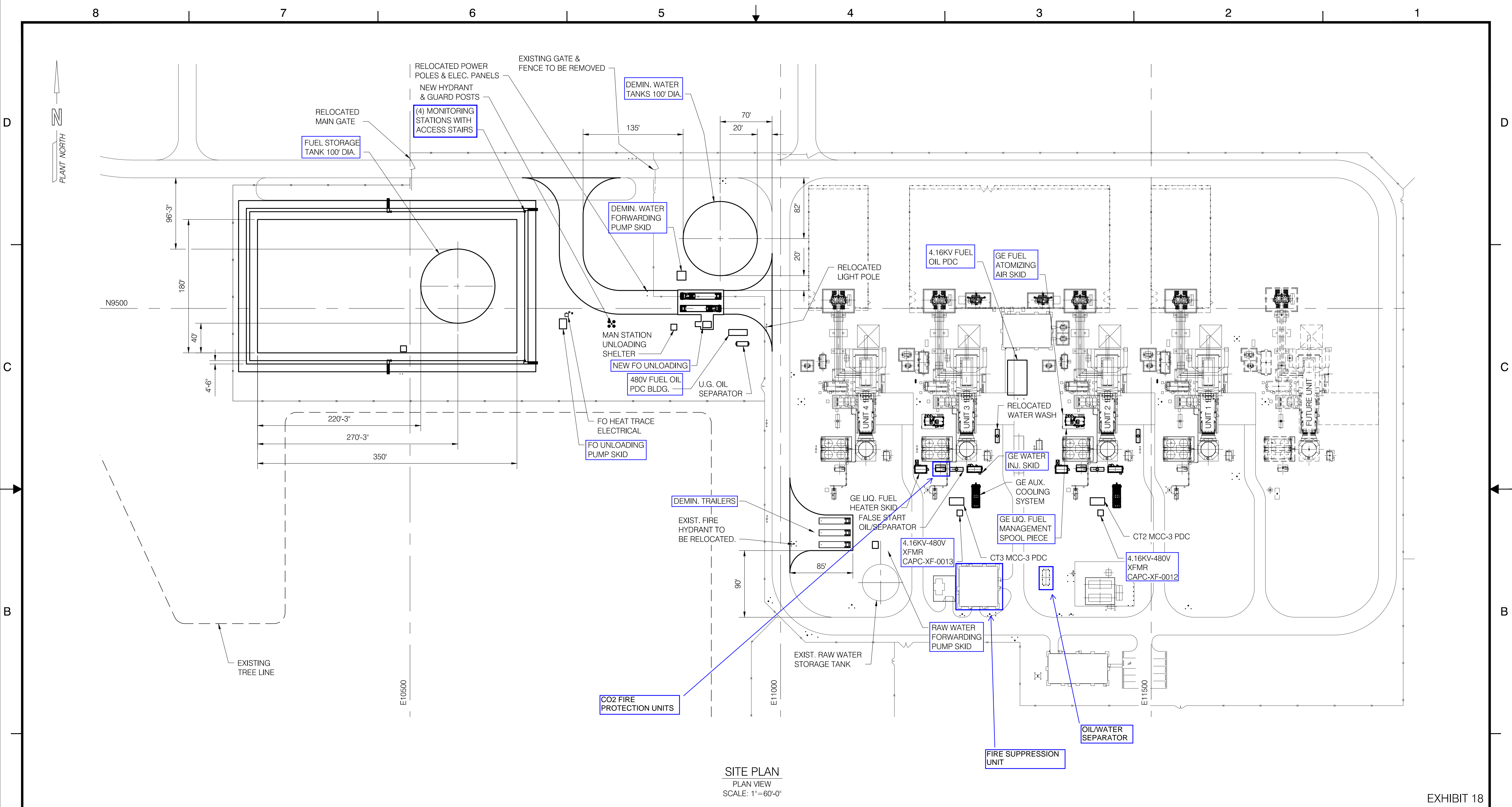
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Project Location Map
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Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
 PLAN VIEW
 SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
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CLIENT INFORMATION/LOGO				

APPROVALS	
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MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its RE Act program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Oglethorpe is notifying you about the referenced project because of the possible interest of the Muscogee (Creek) Nation in Washington County, Georgia. Should the Muscogee (Creek) Nation elect to participate in Section 106 review of the referenced project, please notify me in writing via letter or email as soon as possible at the following addresses – Sara Kent at sskent@burnsmcd.com or 4004 Summit Blvd., Ste. 1200, Atlanta, GA 30319.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort

needed to identify additional historic properties which might be affected by the referenced project. Oglethorpe will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to Greg Korosec at Gregory.Korosec@usda.gov.

Please submit your response **electronically** by 7/25/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,

Gregory Korosec, PhD, RPA
Archaeologist
Rural Utilities Service, Rural Development, USDA

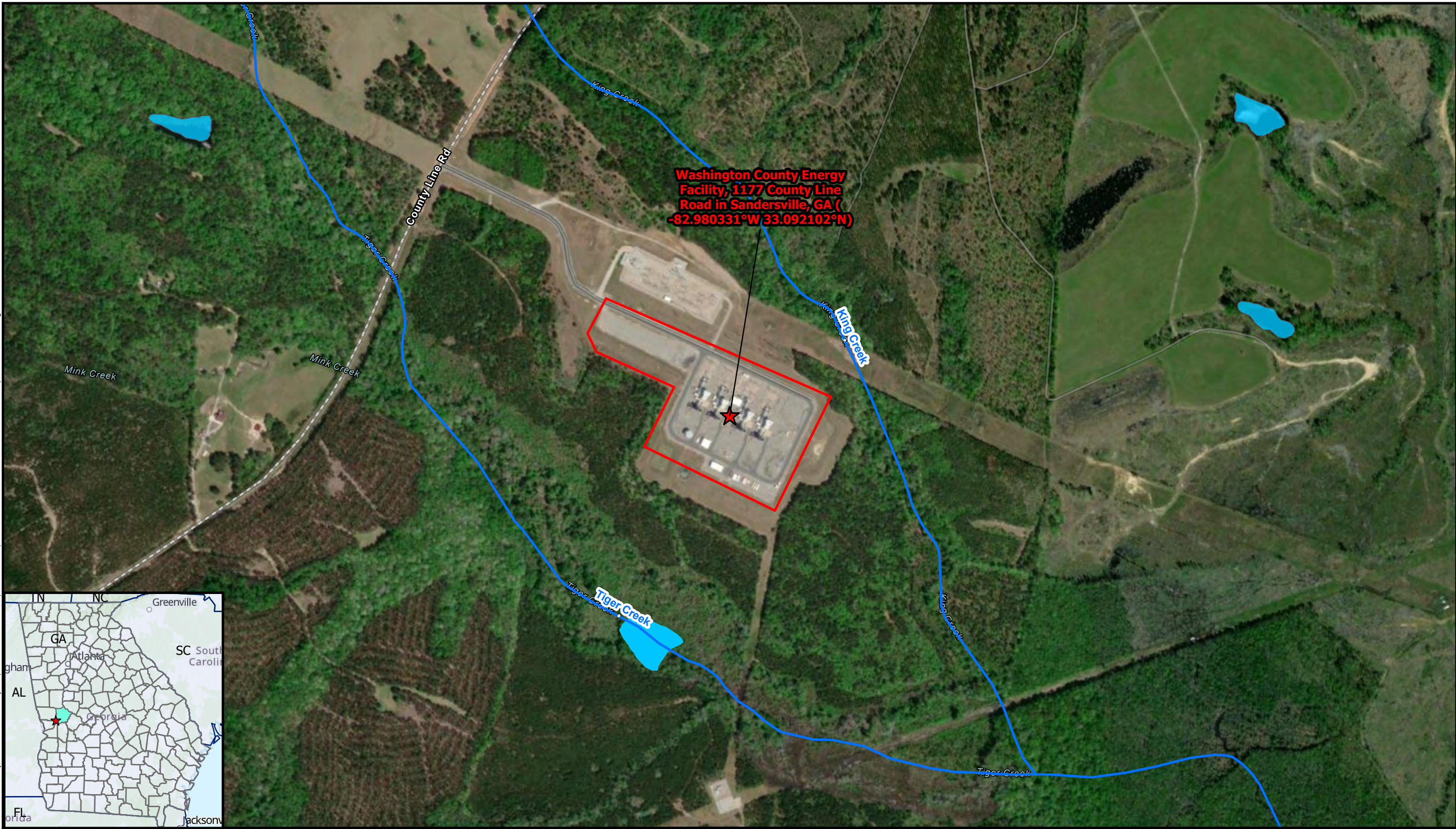


Enclosure Attachment

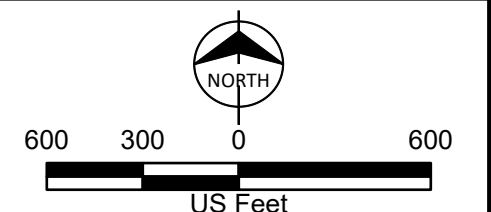
CC section106@mcn-nsn.gov
thunt@muscogeenation.com

ATTACHMENT – PROJECT MAPS

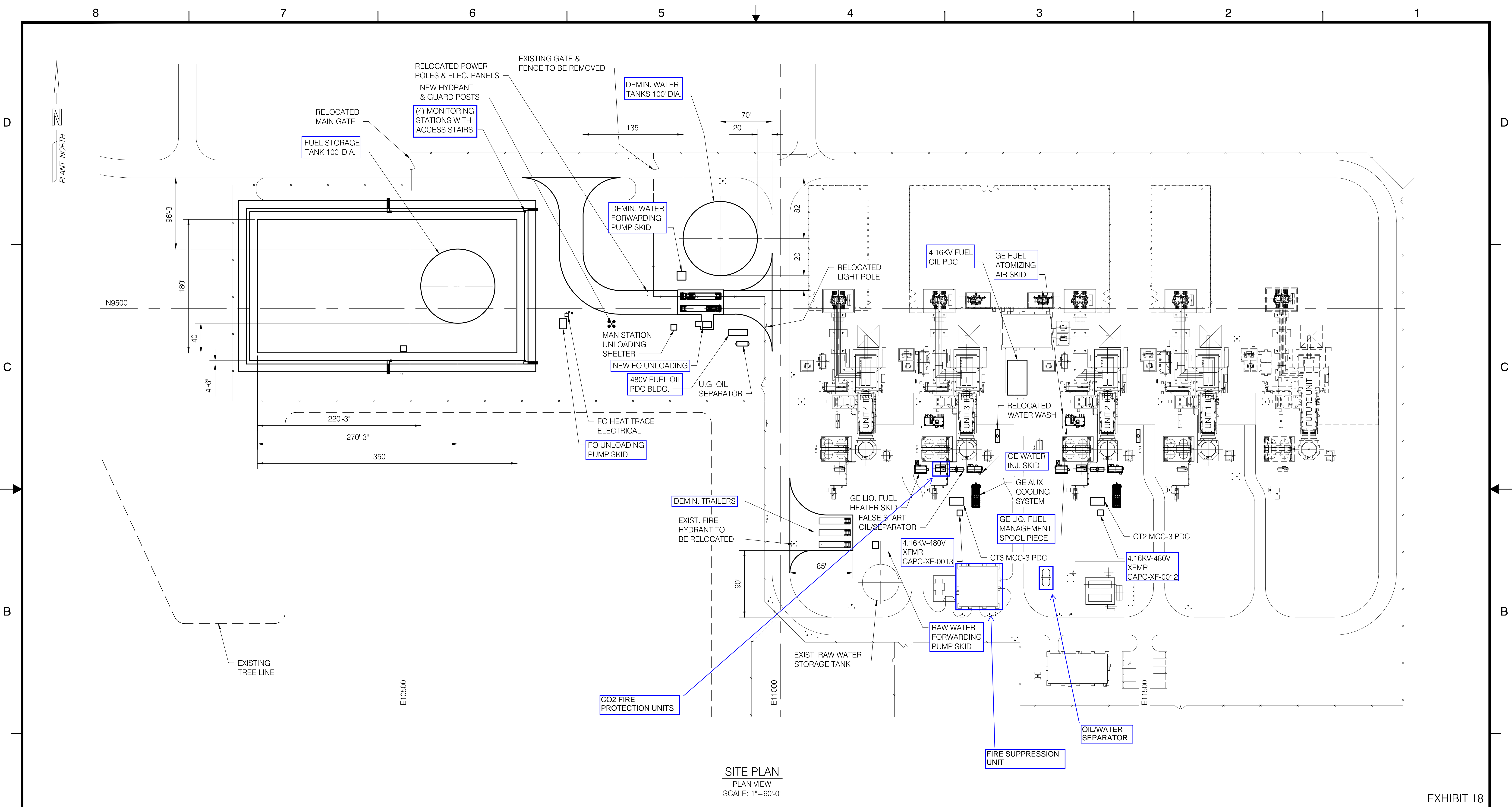
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA



SITE PLAN
PLAN VIEW
SCALE: 1"=60'-0"

EXHIBIT 18

REV	DESCRIPTION	DATE	DRAWN	CHKD	APPR
D	XXXXX	XX/XX/XX	XXX	XXX	XXX
C	XXXXX	XX/XX/XX	XXX	XXX	XXX
B	XXXXX	XX/XX/XX	XXX	XXX	XXX
A	XXXXX	XX/XX/XX	XXX	XXX	XXX

CLIENT INFORMATION/LOGO				

APPROVALS	
APPROVED:	X.X.XXXXXXXXXX
DATE:	XX/XX/XX
DRAWN:	R.W.MANTOOTH
CHECKED:	X.X.XXXXXXXXXX
PROJ ENGR:	X.X.XXXXXXXXXX
PROJ MGR:	X.X.XXXXXXXXXX
GENERAL TOLERANCES	
TOLERANCE UNITS: INCHES	
TOLERANCES UNLESS SPECIFIED OTHERWISE:	
2 PLACE DECIMALS:	± .05
3 PLACE DECIMALS:	± .025
4 PLACE DECIMALS:	± .0025
ANGLES: ± 0.5°	
FRACTIONS: ± 1/8	

PROFESSIONAL ENGINEER'S SEAL

THIS DRAWING CONTAINS PROPRIETARY INFORMATION WHICH IS TO BE HELD CONFIDENTIAL AND MAY NOT BE REPRODUCED OR DISCLOSED TO OTHERS WITHOUT THE PRIOR WRITTEN CONSENT OF MESA ASSOCIATES, INC. OR DULY AUTHORIZED REPRESENTATIVE THEREOF.

Mesa Associates, Inc.
Engineers and Consultants

480 PRODUCTION AVENUE | MADISON, AL 35758 | (256) 258-2100

MESA ASSOCIATES, INC. POWER GENERATION KNOXVILLE, TN		
OGLETHORPE POWER - WASHINGTON CO. DUAL FUEL CONVERSION GENERAL ARRANGEMENT SITE PLAN		
SCALE	DRAWING NUMBER	REV
1"=60'-0"	23378003-MD003-001	D

Kent, Sara S

From: Carlock, Michael D
Sent: Thursday, August 17, 2023 4:13 PM
To: ER
Cc: Kent, Sara S; Long, Madeline R; Black, Rachel
Subject: Environmental Review Form from Burns & McDonnell for Oglethorpe Power Corp. Washington Dual Fuel Conversion Project - Washington County, GA.
Attachments: Washington Dual Fuel Submittal to SHPO & OSA.zip

Hello,

Please find attached an environmental review form and attachments for the above project for your review.

The project is being constructed entirely within an existing power facility that has been highly disturbed from its construction and maintenance. There are three recommended NRHP eligible archaeological sites, four ineligible sites, and one unknown eligibility site within one mile of the Project; however, none are within the APE. There are no historic properties that are NRHP listed or eligible for listing within one mile of the Project.

Burns & McDonnell is seeking SHPO and OSA guidance regarding the need (or not) for archaeological/architectural survey for the Washington Dual Fuel Conversion Project in Washington County, Georgia.

Thank you,

Michael D. Carlock \ Burns & McDonnell
Senior Cultural Resources Specialist
O - (470) 579-3556
mdcarlock@burnsmcd.com \ burnsmcd.com
4004 Summit Blvd., Ste 1200 \ Atlanta, GA 30319

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Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|---|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> <u>Utilities/Infrastructure</u> |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. Kristian Poncho
Tribal Historic Preservation Officer
Coushatta Tribe of Louisiana
1940 C.C. Bel Road
Elton, LA 70532

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Poncho:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Coushatta Tribe of Louisiana. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

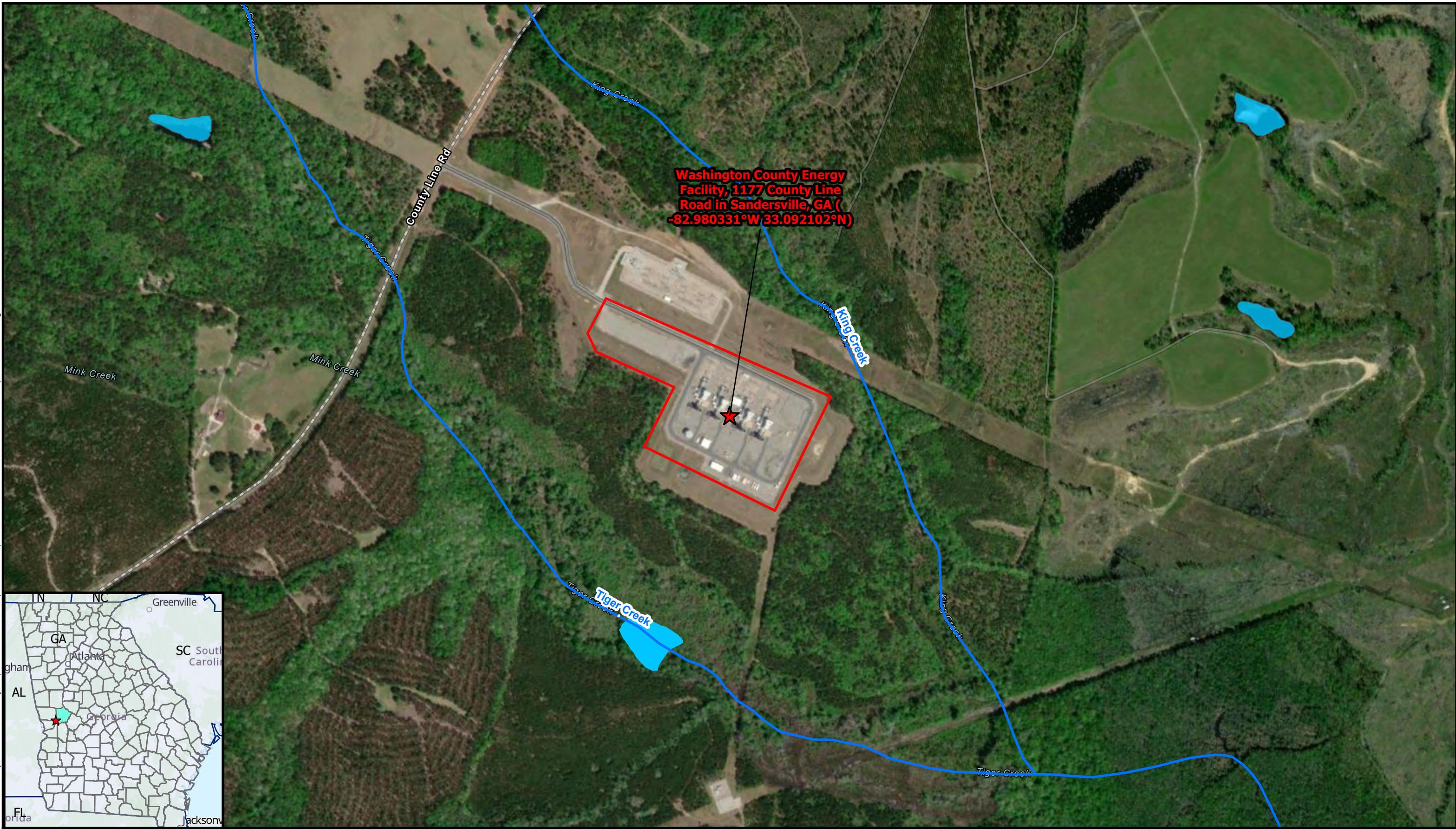
Kristen Bastis, MA, RPA

Archaeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map
GA SHPO Project Review Form

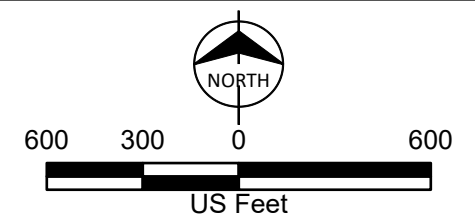
Path: C:\ATL_ENS_Projects\Effingham Energy Facility_Oglethorpe_20220929_BU\Effingham Energy Facility_Oglethorpe_20220929_BU.aprx bouruowhe 5/11/2023
Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

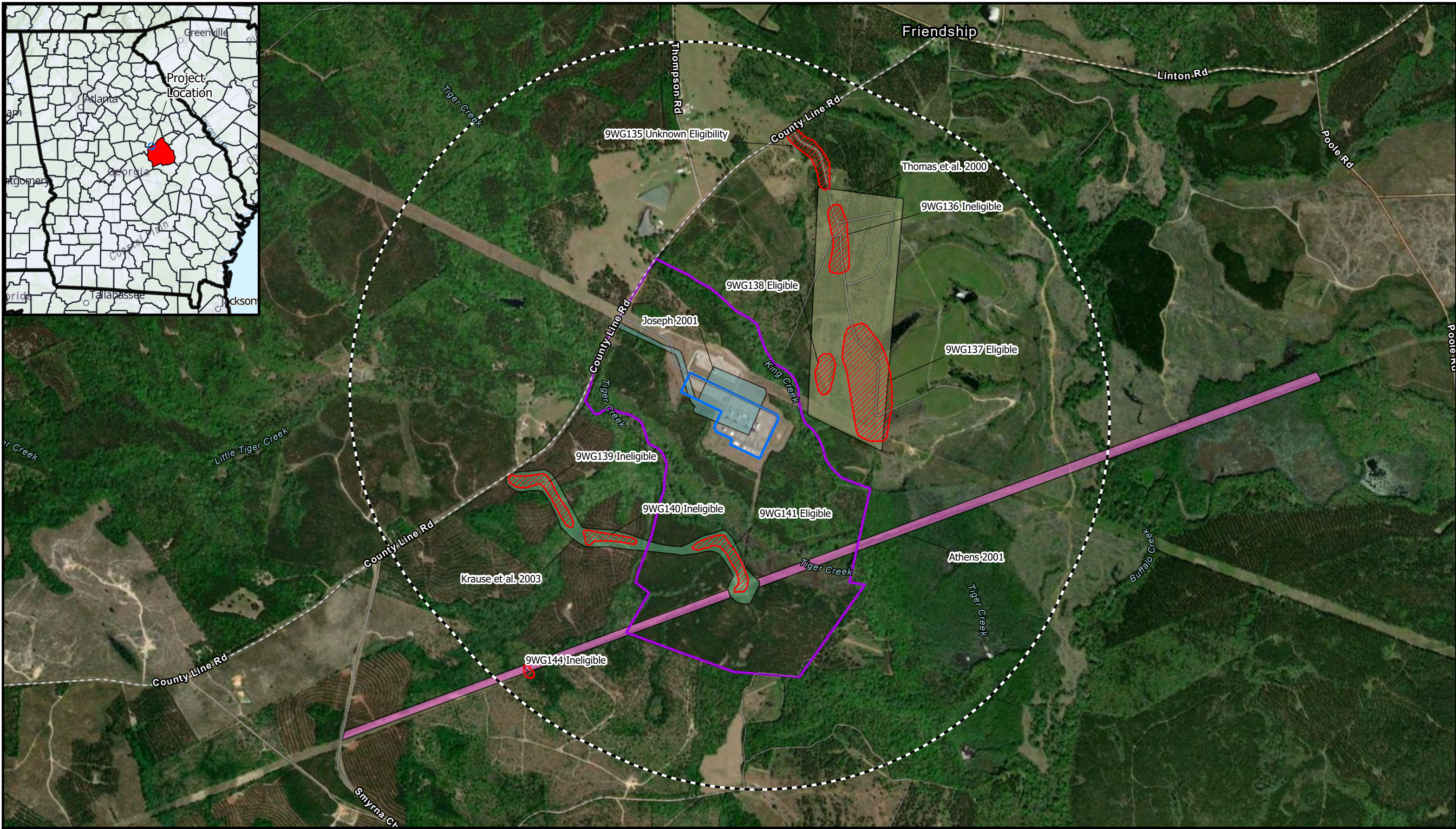


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
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 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Athens 2001
- Project Boundary
- Oglethorpe Property Boundary
- Joseph 2001
- Krause et al. 2003
- Thomas et al. 2000
- Known Archaeological Site

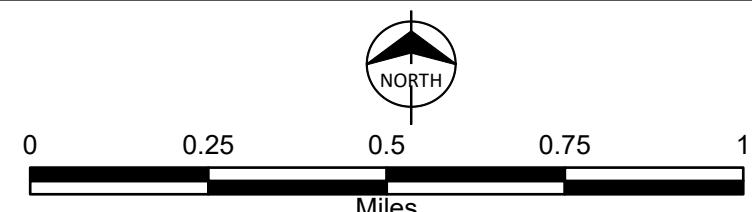


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
 SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|---|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> <u>Utilities/Infrastructure</u> |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Dr. Paul Backhouse
Sr. Director of the Heritage and Environment Resource Office
Seminole Tribe of Florida
30290 Josie Billie Hwy PMB 1004
Clewiston, FL 33440

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Dr. Backhouse:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Seminole Tribe of Florida. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

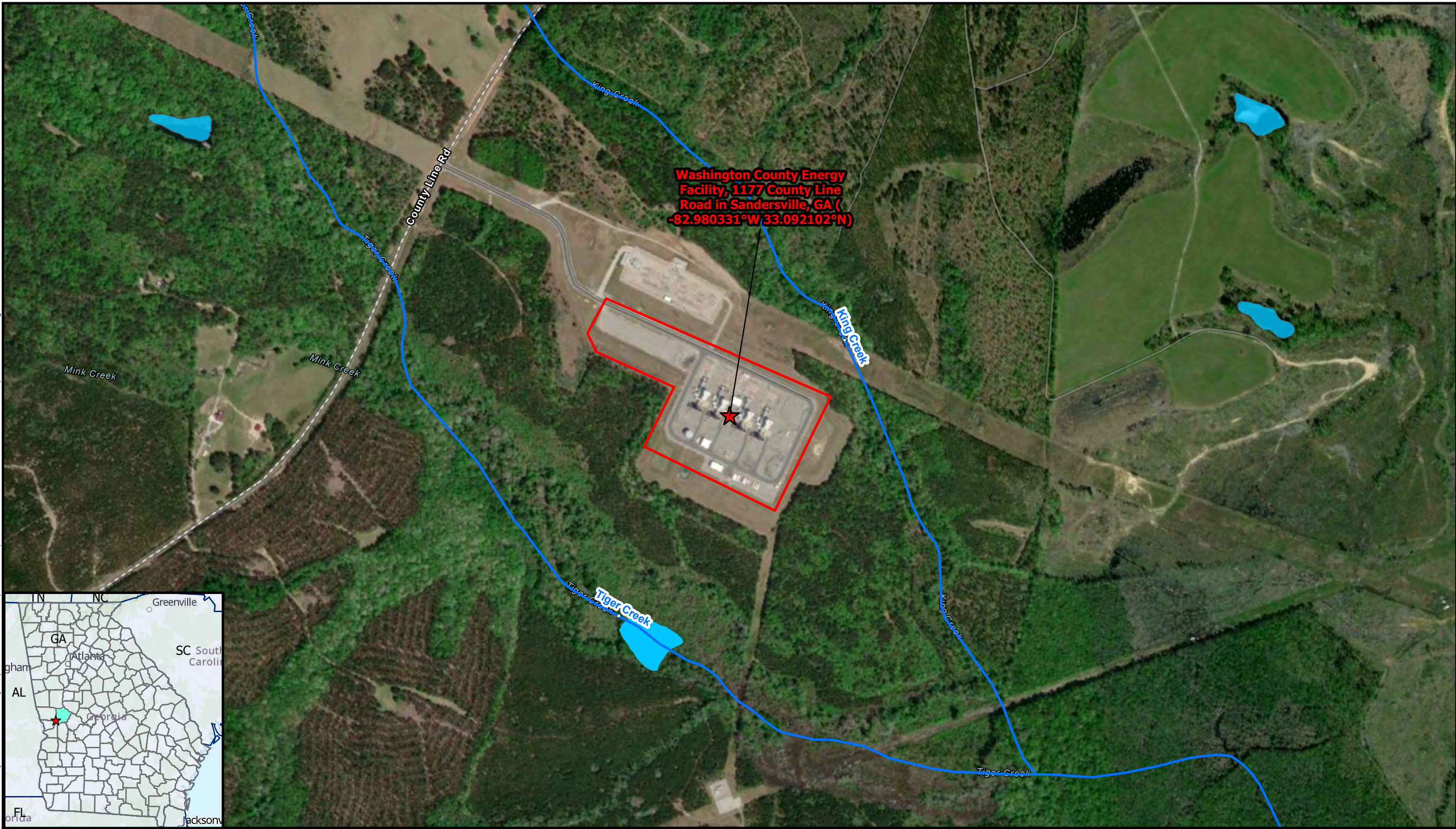
Kristen Bastis, MA, RPA

Archeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map
GA SHPO Project Review Form

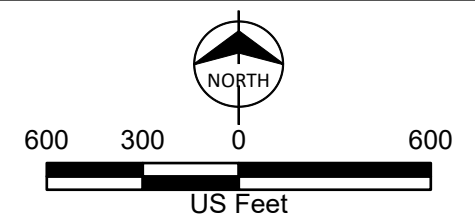
Path: C:\ATL_ENS_Projects\Effingham Energy Facility_Oglethorpe_20220929_BU\Effingham Energy Facility_Oglethorpe_20220929_BU.aprx bouruowhe 5/11/2023
Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

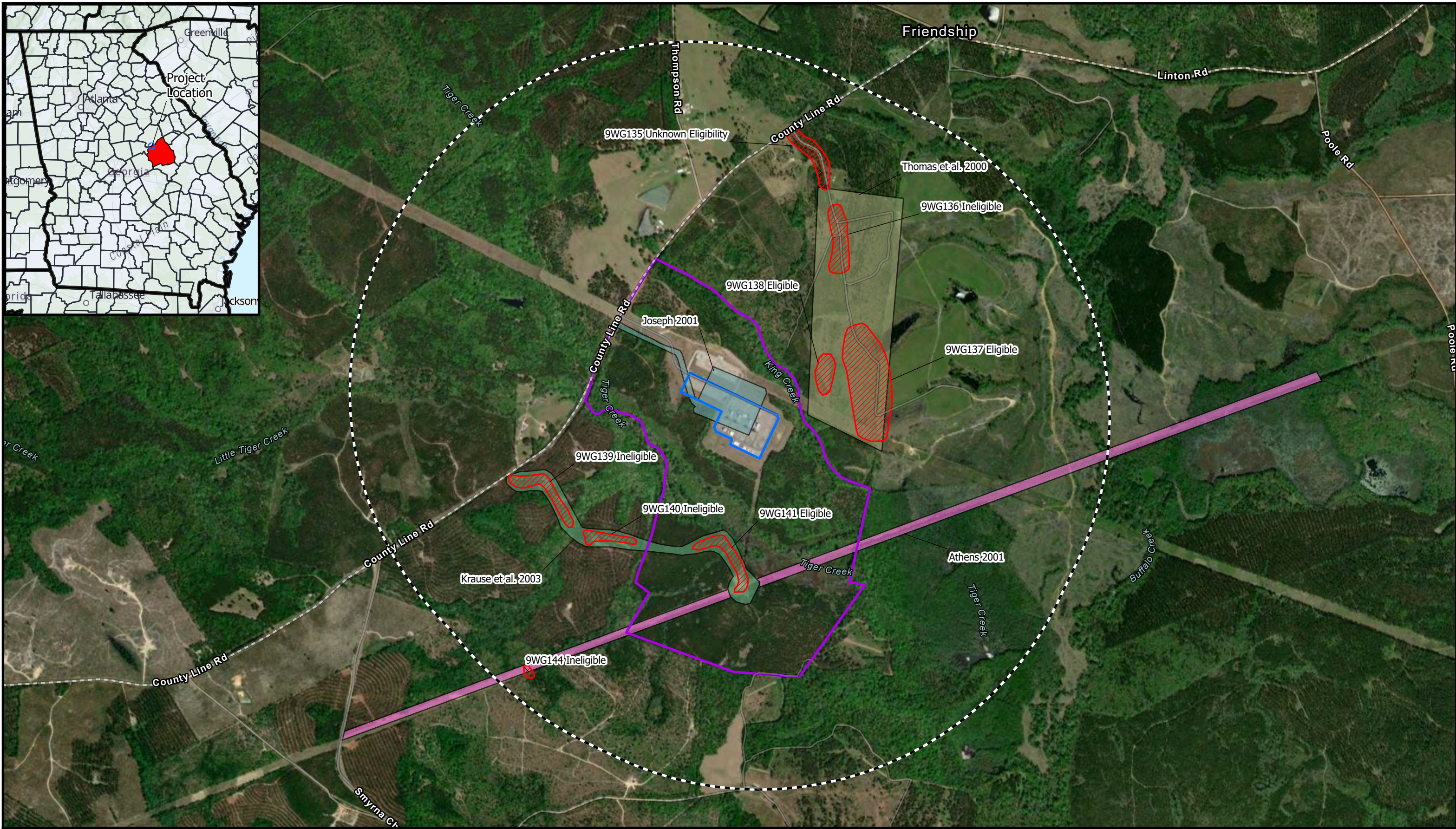


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mcdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
 Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA
 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Project Boundary
- Athens 2001
- Joseph 2001
- Oglethorpe Property Boundary
- Krause et al. 2003
- Thomas et al. 2000
- Known Archaeological Site

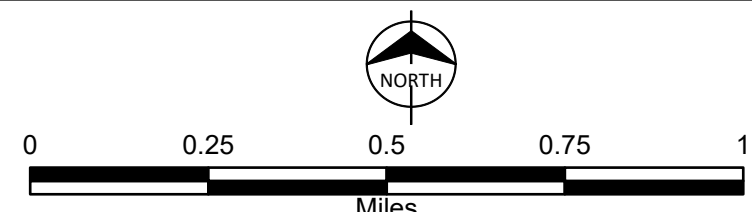


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
 SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|---|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
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| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
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| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

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Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

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**If yes, please explain: N/A*

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**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

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 - o Include all contact information as HPD will respond via email to the submitter.
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 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
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9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. Larry Haikey
Tribal Historic Preservation Officer
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Haikey:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Poarch Band of Creek Indians. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

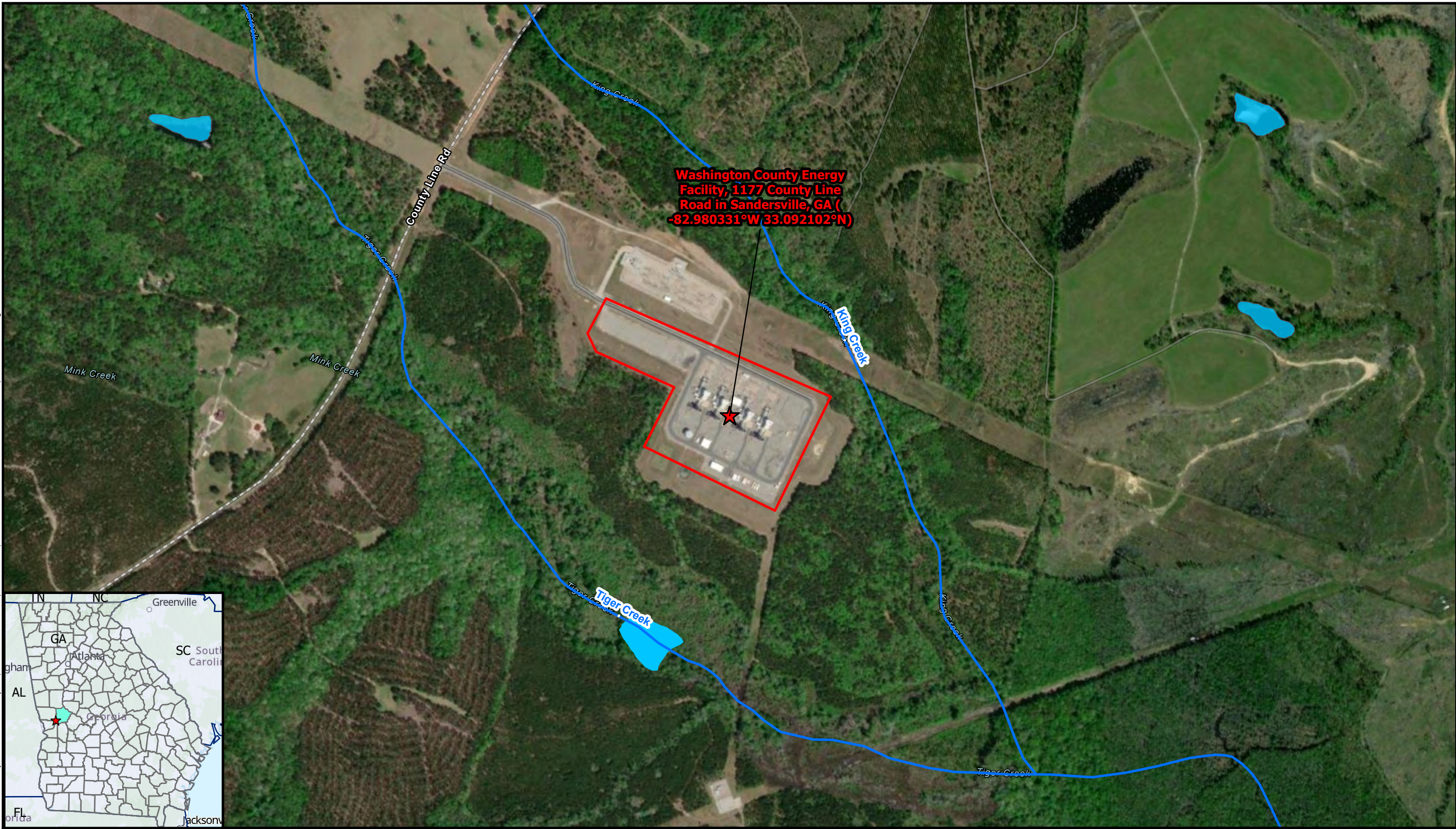
Kristen Bastis, MA, RPA

Archeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map
GA SHPO Project Review Form

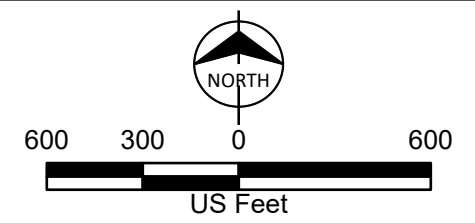
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

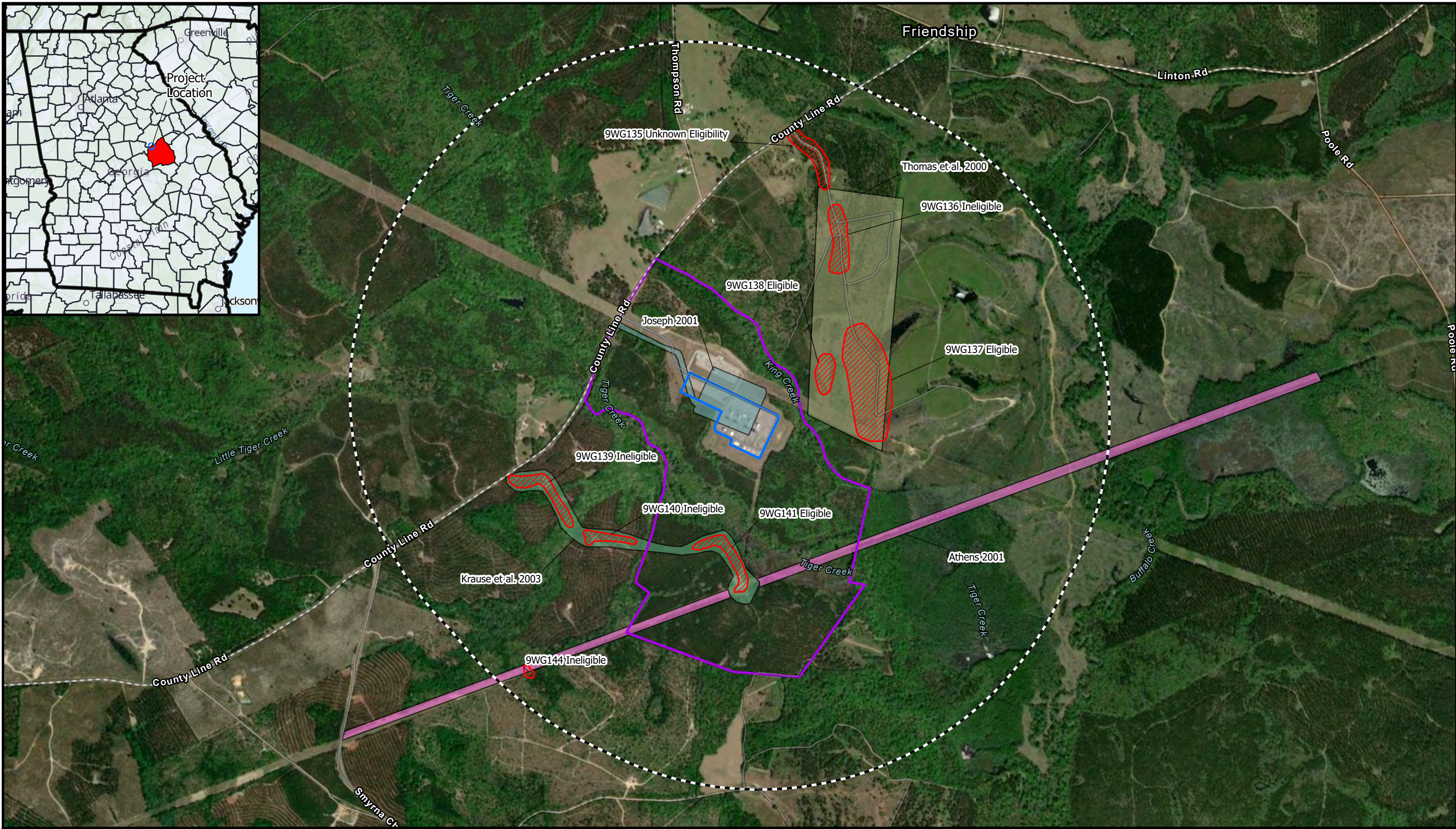


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
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 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Athens 2001
- Project Boundary
- Oglethorpe Property Boundary
- Joseph 2001
- Krause et al. 2003
- Thomas et al. 2000
- Known Archaeological Site

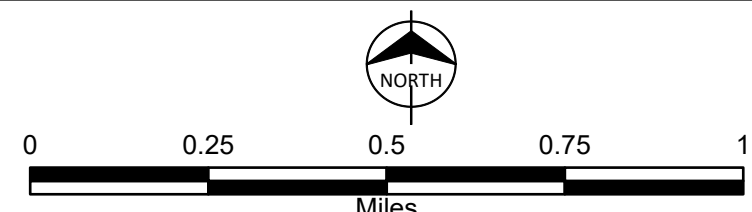


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|--|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> Utilities/Infrastructure |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.8706512

Alabama-Quassarte Tribal Town
P.O. Box 646
Okemah, OK 74859

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
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Washington County Energy Facility Dual Fuel Conversion Project
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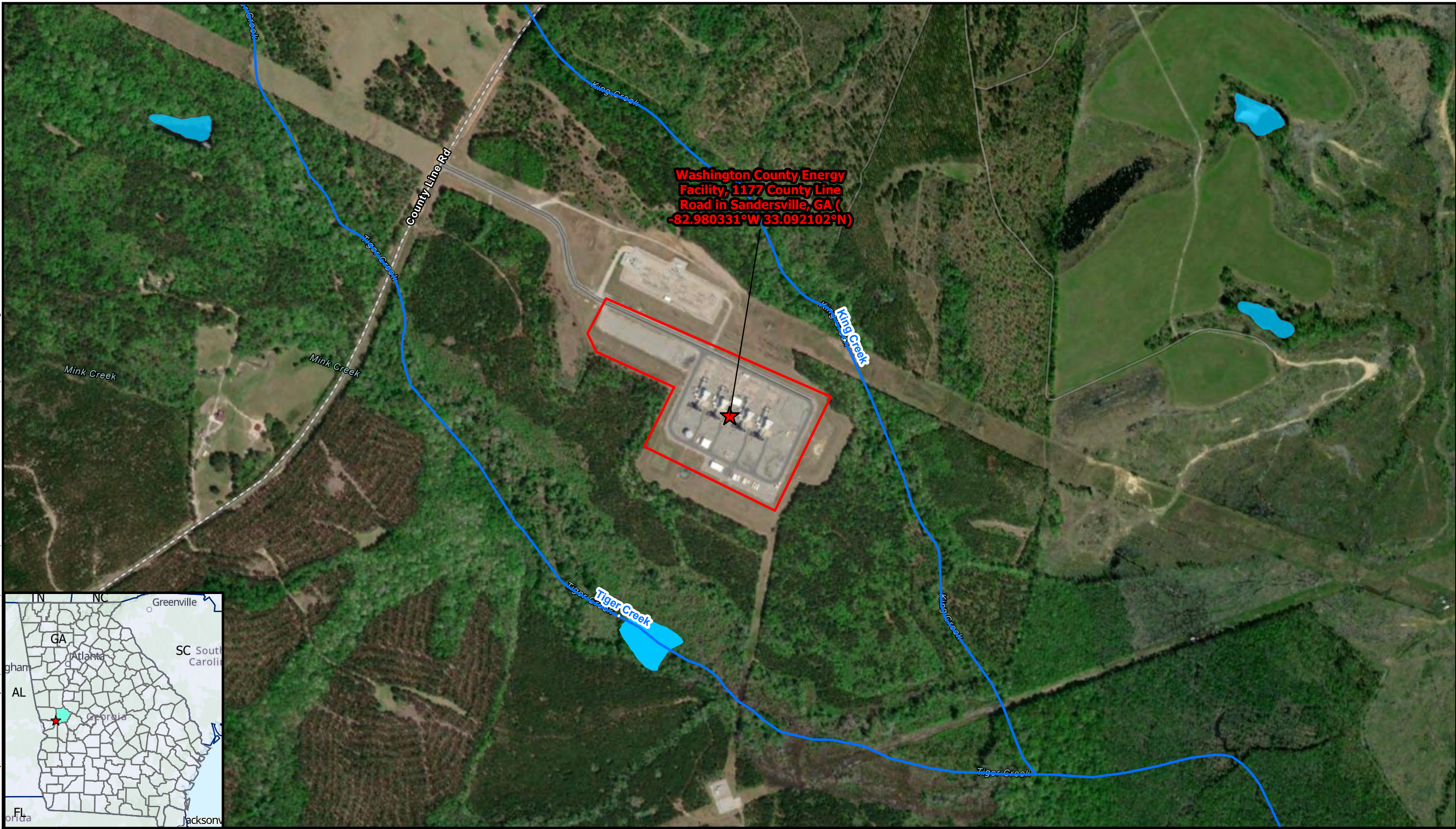
Kristen Bastis, MA, RPA
Archeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map

GA SHPO Project Review Form

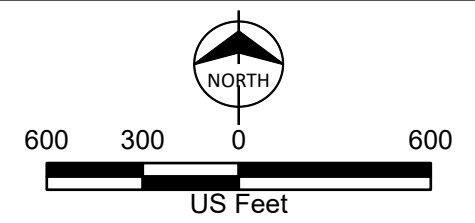
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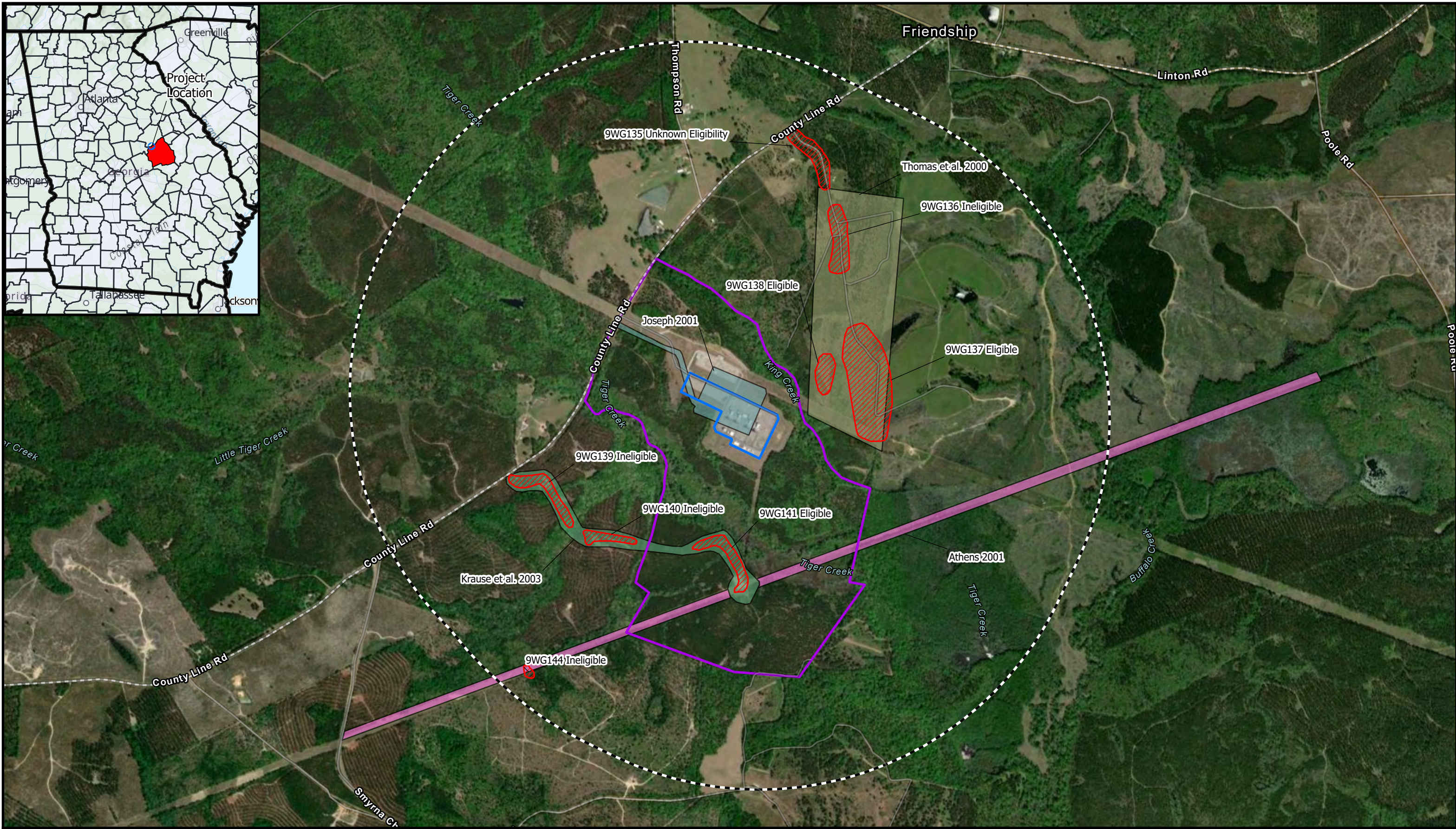


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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
 Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA
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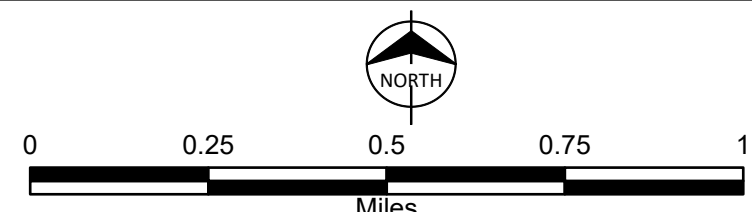


Figure A-1
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 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

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This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|--|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> Utilities/Infrastructure |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. David Cook
Tribal Administrator
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Administrator Cook:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Kialegee Tribal Town. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

Kristen Bastis, MA, RPA
Archeologist

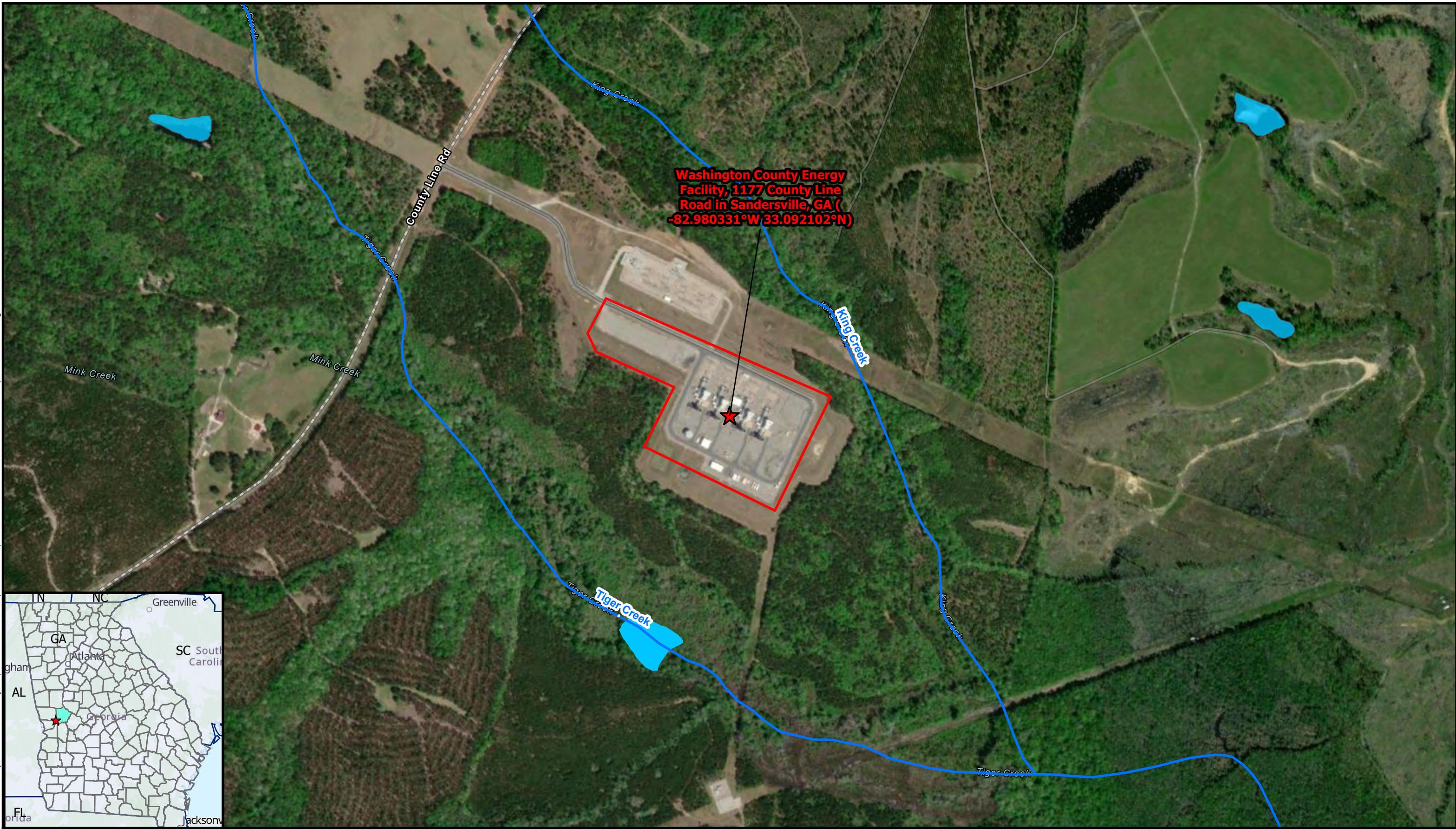
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map

GA SHPO Project Review Form

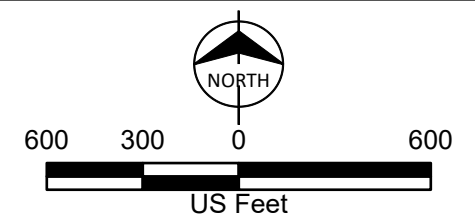
Path: C:\ATL_ENS_Projects\Effingham Energy Facility_Oglethorpe_20220929_BU\Effingham Energy Facility_Oglethorpe_20220929_BU.aprx bouruowhe 5/11/2023
Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

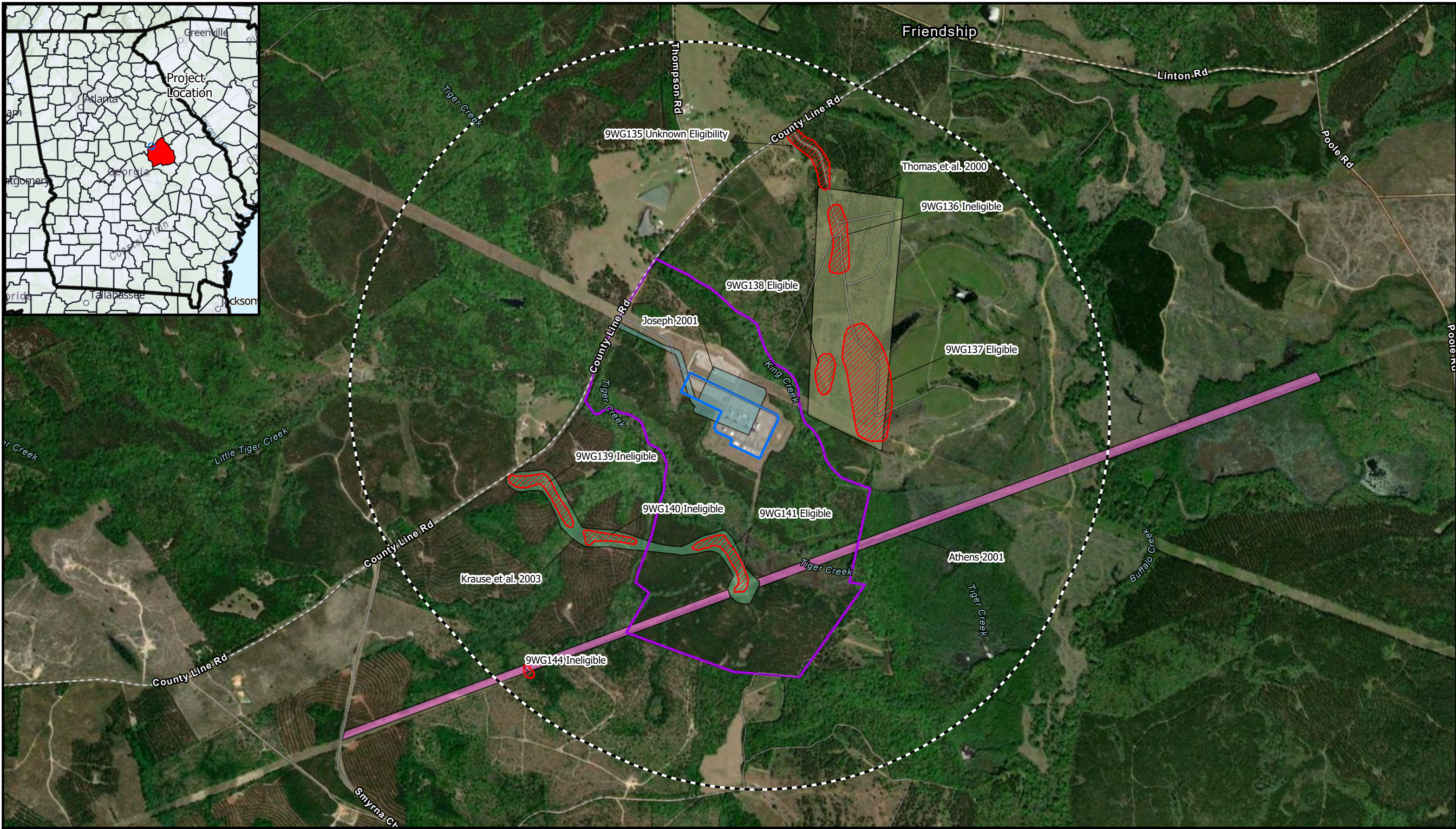


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
 Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, Esri, HERE, Garmin, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA
 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Athens 2001
- Project Boundary
- Oglethorpe Property Boundary
- Joseph 2001
- Krause et al. 2003
- Thomas et al. 2000
- Known Archaeological Site

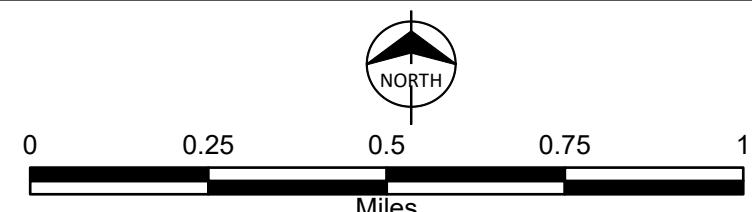


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|---|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> <u>Utilities/Infrastructure</u> |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.** Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names:* N/A

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain:* N/A

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. Turner Hunt
Tribal Historic Preservation Officer
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Hunt:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Muscogee (Creek) Nation. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

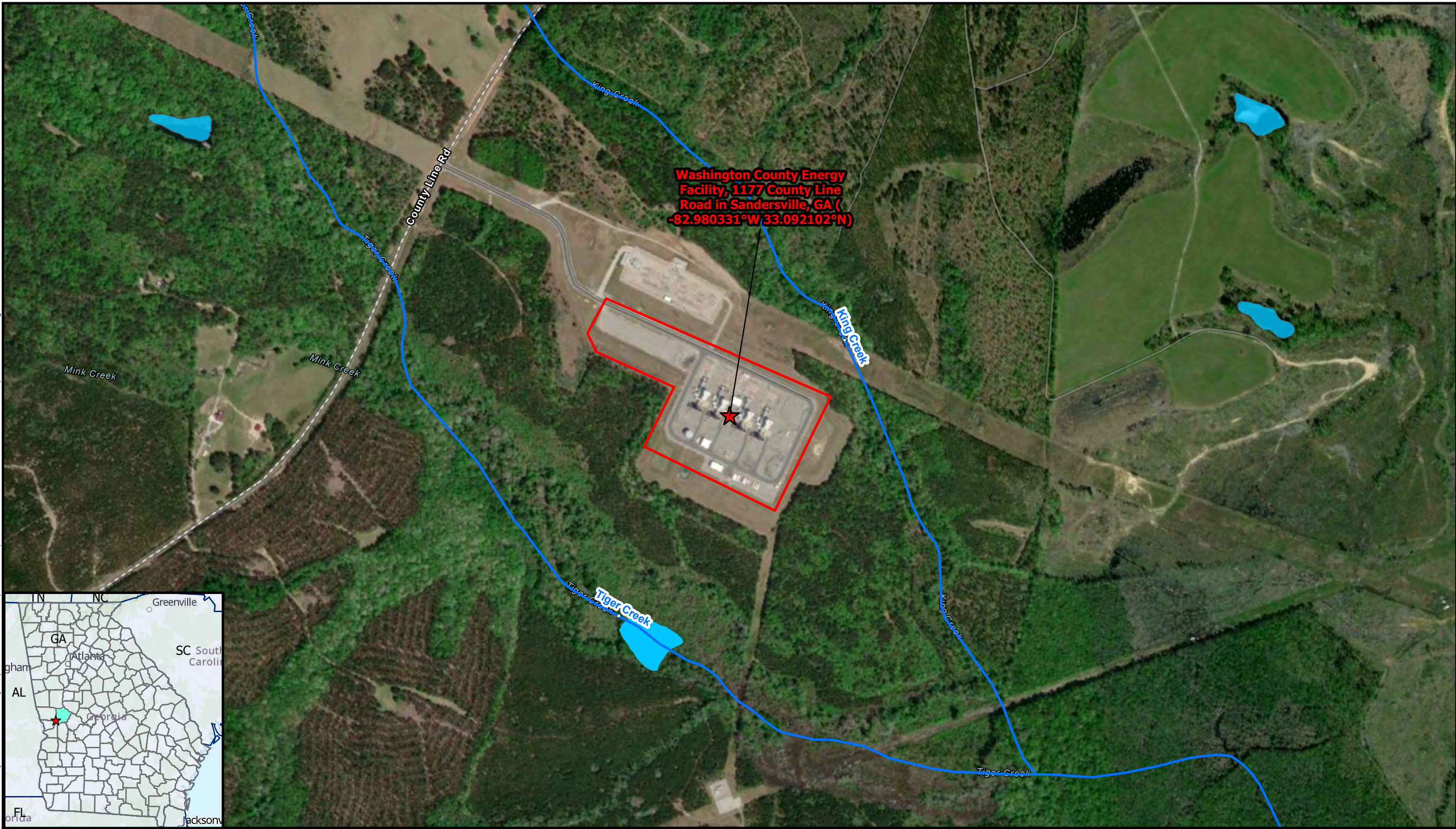
Kristen Bastis, MA, RPA

Archeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map
GA SHPO Project Review Form

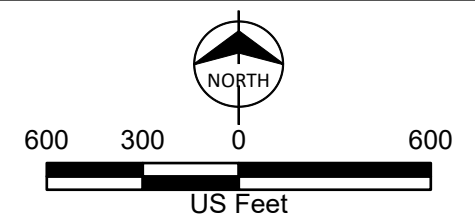
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

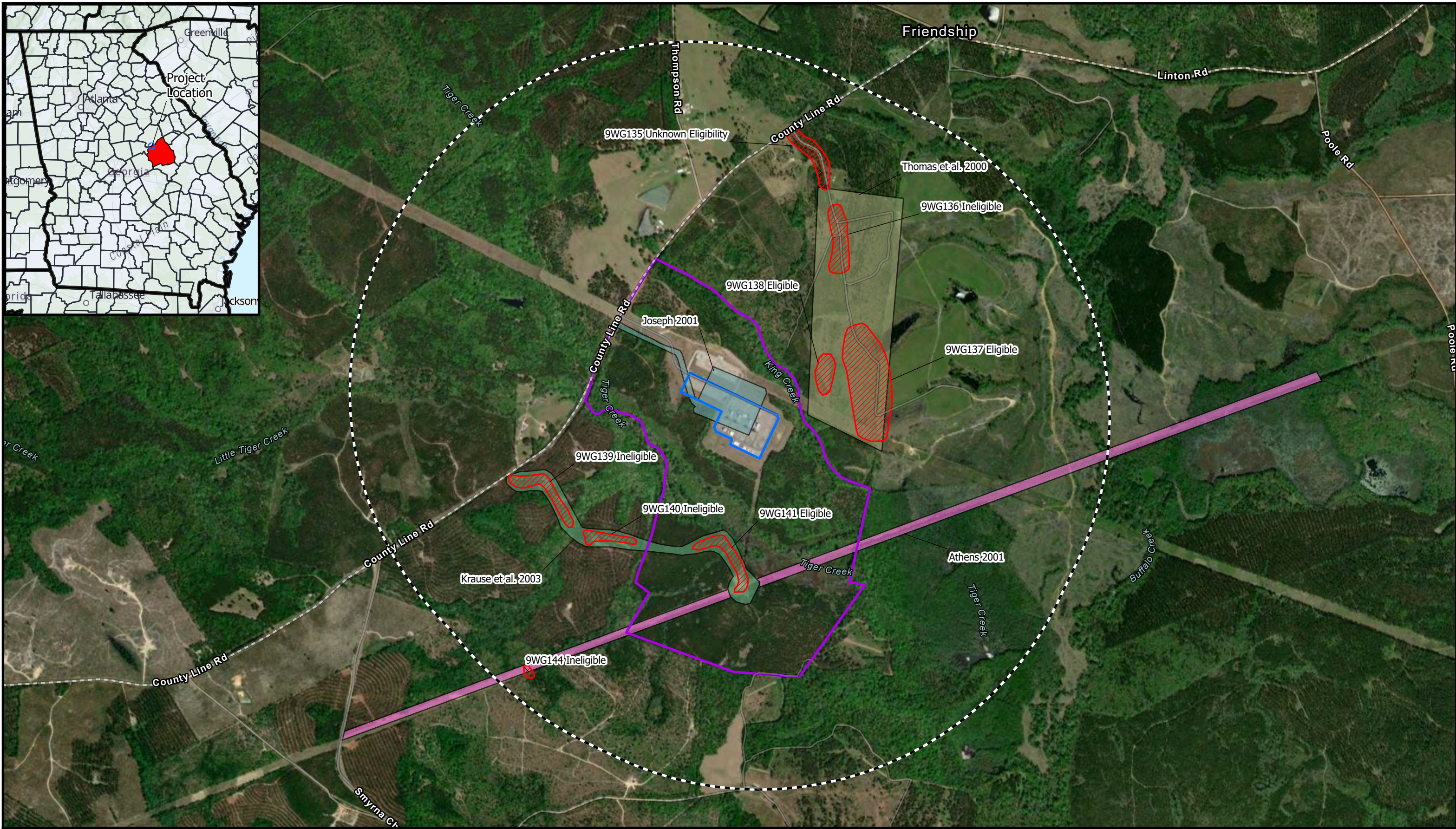


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcartlock 8/17/2023
 Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, Esri, HERE, Garmin, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA
 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Project Boundary
- Athens 2001
- Joseph 2001
- Oglethorpe Property Boundary
- Krause et al. 2003
- Thomas et al. 2000
- Known Archaeological Site

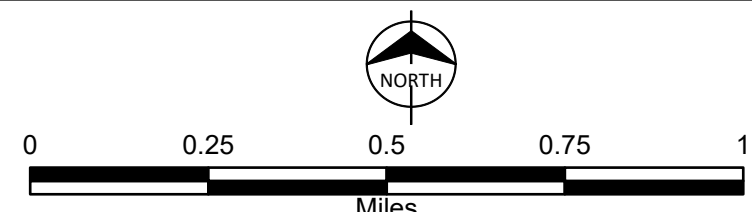


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
 SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: Applicant Consultant

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|---|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> <u>Utilities/Infrastructure</u> |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
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9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. Ben Yahola
Historic Preservation Officer
Seminole Nation of Oklahoma
P.O. Box 1498
Wewoka, OK 74884

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Yahola:

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Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

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If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

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Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Seminole Nation of Oklahoma. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

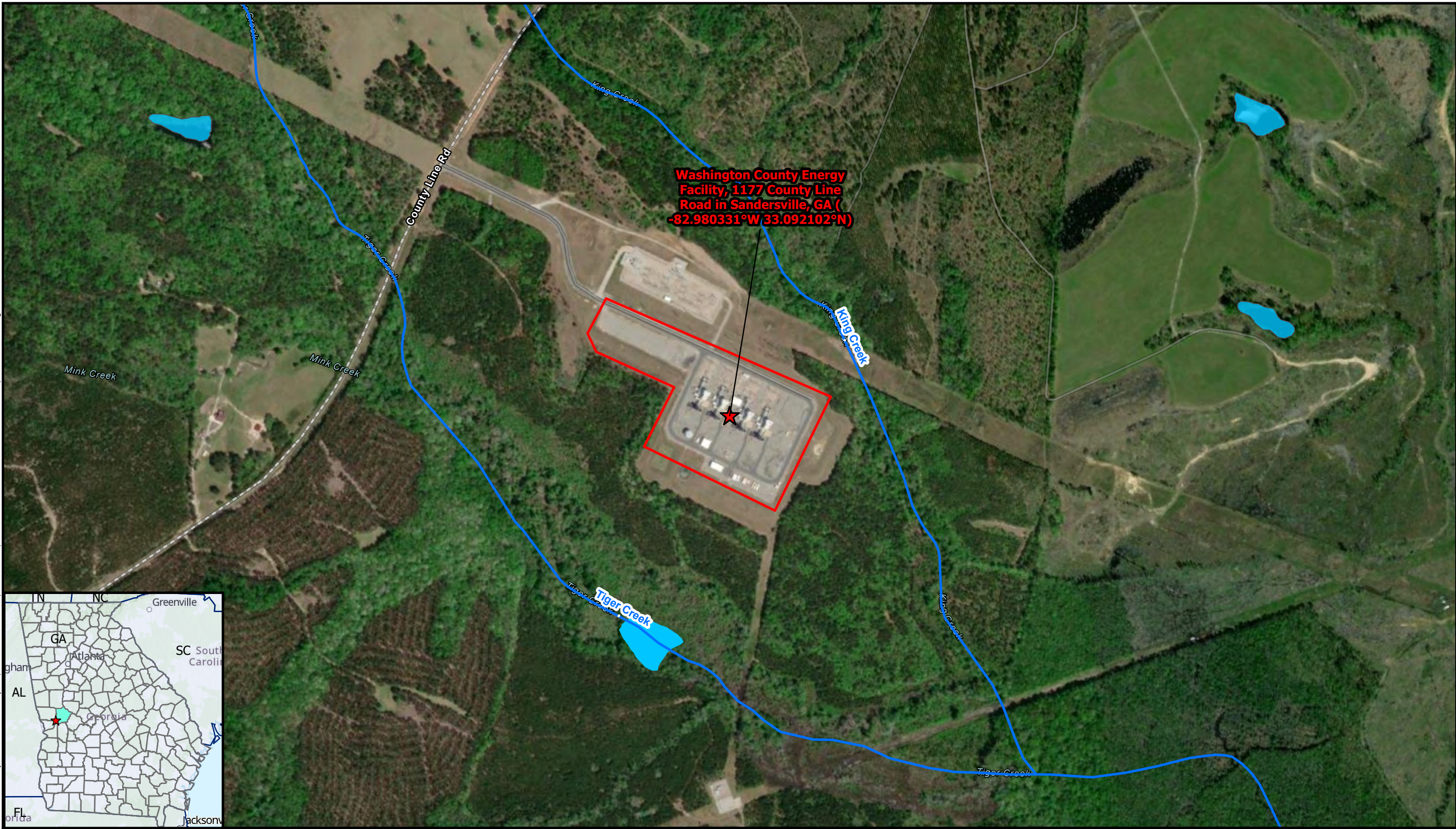
Kristen Bastis, MA, RPA

Archeologist
Rural Utilities Service, Rural Development, USDA

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Project Map
GA SHPO Project Review Form

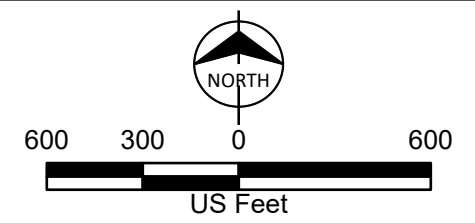
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



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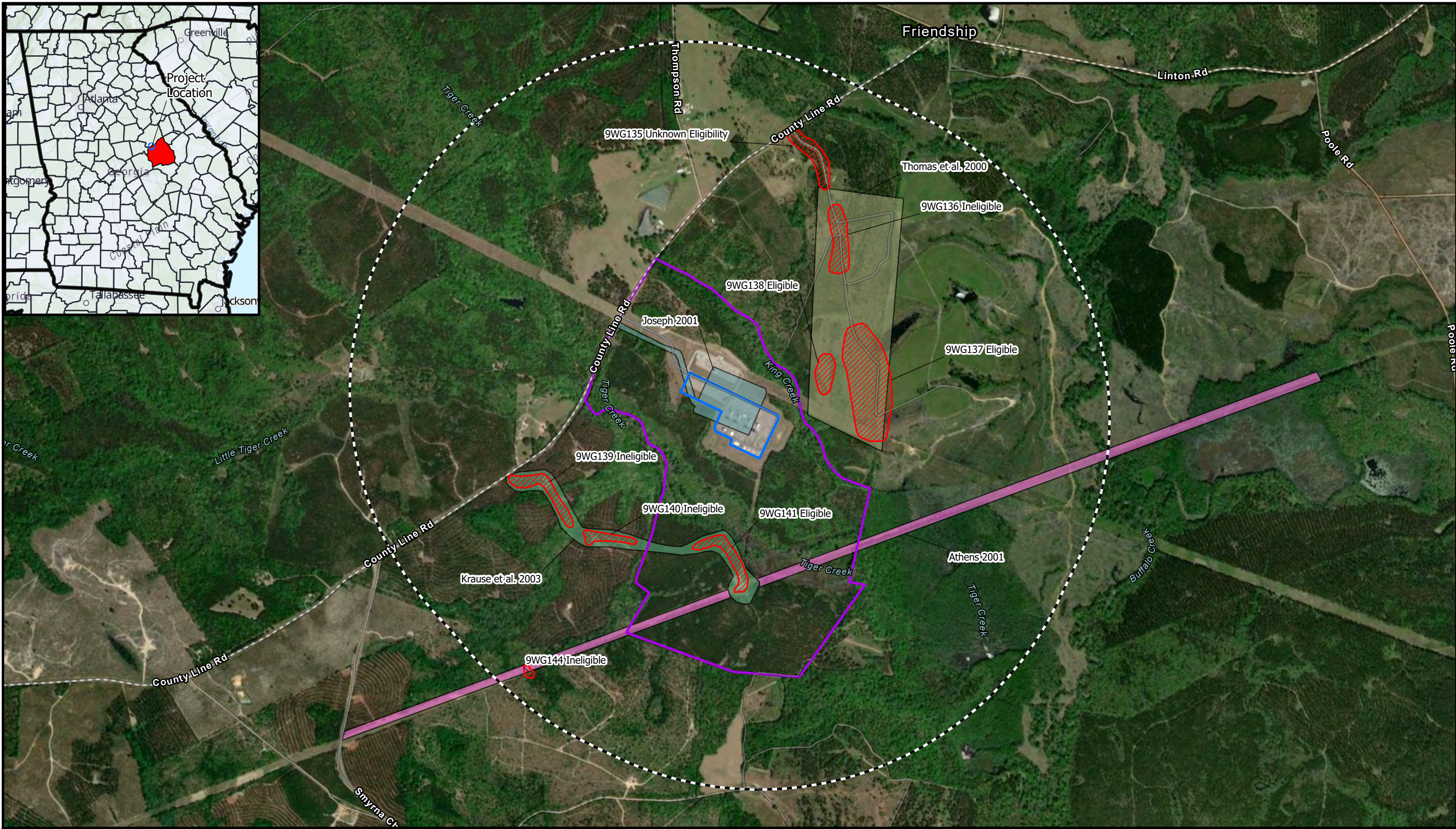


- ★ Washington County Energy Facility
- ▭ Property Boundary
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Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
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Washington County, GA

Path: C:\Users\mcdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcarlock 8/17/2023
 Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, Esri, HERE, Garmin, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA
 World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS, EPA
 World Imagery: Maxar



- 1-Mile Study Area
- Known Archaeological Site
- Oglethorpe Property Boundary
- Project Boundary
- Athens 2001
- Joseph 2001
- Krause et al. 2003
- Thomas et al. 2000

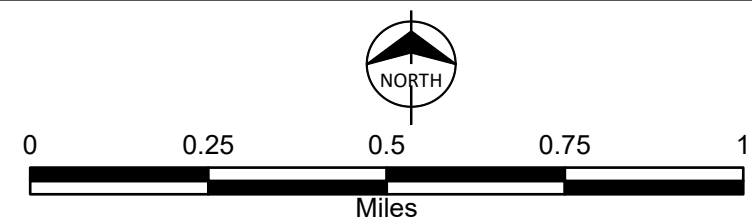


Figure A-1
 Cultural Resource Map
 Washington Dual Fuel
 Oglethorpe Power Company
 Washington County, GA

HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

Dear Mr. Carlock:

The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of upgrading the circa (ca.) 2002 Washington County Energy Facility located on Washington County parcel 019 006 at 1177 County Line Road in Sandersville, including converting the existing simple cycle natural gas combustion turbine (CT) Units 2 and 3 into dual fuel capable CTs, installing a 48-foot (ft) overall height demineralized water storage tank and a 48-ft Number 2 diesel fuel oil tank in the existing facility footprint, and making unknown mechanical upgrades to existing equipment. Based on the information provided and desktop research, HPD finds multiple historic resources within the proposed project's area of potential effect (APE), some of which may be eligible for listing in the National Register of Historic Places (NRHP). However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to the scope of work, existing modern intrusions, and previous ground disturbance.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

**THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL.
 SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.**

I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|--|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
| <input type="checkbox"/> Demolition | <input checked="" type="checkbox"/> Utilities/Infrastructure |
| <input type="checkbox"/> Rehabilitation | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> Addition to Existing Building/Structure | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> New Construction | |

B. Project Description and Plans This should include a *detailed scope of work*, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information:

Oglethorpe Power Corporation's (Oglethorpe) proposed Washington County Energy Facility Dual Fuels Project (Project) involves upgrading two of Washington County Energy Facility's (Facility) natural gas-fired simple-cycle combustion turbines (CTs) to dual fuel CTs that utilize both natural gas and No. 2 diesel fuel oil. This dual fuel conversion will increase the resiliency and reliability of the facility's electrical output by allowing for a back-up fuel source during times of heavy loads when natural gas supply is curtailed or cut off. The proposed infrastructure required for this Project includes a diesel fuel oil storage tank and a demineralized water storage tank, along with associated mechanical and software upgrades. All infrastructure upgrades and ground-disturbing activities will occur within the existing Facility footprint. Please review the attached Project Description for the Project's detailed scope of work.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____

**If yes, are project plans/scope of work available yet? YES X NO ____*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
| 3. Mining | YES ____ | NO <u>X</u> |
| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):

The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.



9/25/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4018
Stop 1570,
Washington, DC,
20250
Voice 202.870.6512

Mr. David Frank
Tribal Historic Preservation Officer
Thlopthlocco Tribal Town
P.O. Box 188
Okenah, OK 74859

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
Rural Utilities Services (RUS) Recommended Finding of No Adverse effect
Oglethorpe Power Corporation
Washington County Energy Facility Dual Fuel Conversion Project
1177 County Line Road, Sandersville, Washington County, Georgia

Dear Mr. Frank:

Oglethorpe Power Corporation (Oglethorpe) is seeking financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) under its Rural Electrification Act (RE Act) for the Washington County Energy Facility Dual Fuel Conversion Project (Project). This Project will not be using the NPA.¹

Oglethorpe owns and operates Units 2 and 3 at the Washington County Energy Facility located at 1177 County Line Rd in Sandersville, Georgia (Facility). Oglethorpe is proposing to construct new infrastructure within the existing footprint of the Facility to provide the ability to use diesel fuel as an alternative fuel source in the Facility's existing natural gas-fired combustion turbines for maintaining plant operations and improving reliability. The proposed infrastructure would include a new aboveground diesel fuel oil storage tank, a new aboveground demineralized water storage tank, and associated new piping and infrastructure. No new combustion turbines will be constructed as part of the Project. A project location map and proposed site plan are enclosed for reference.

Oglethorpe is responsible for providing reliable, efficient, and low-cost power to the 38 EMC members of the not-for-profit generation cooperative who provide power to over 4 million Georgians. The proposed Project would increase reliability at the existing Facility in the event natural gas is curtailed or cut-off in times of heavy loads and allow Oglethorpe to meet system demand with the Facility operating its existing units rather than starting other less efficient units, purchasing power from others, or constructing or obtaining new generation.

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

The APE for the referenced project consists of the area within the existing footprint of the Facility, as shown on the enclosed map. Additionally, the APE does not include any federal and/or tribal lands as de-fined pursuant to 36 CFR § 800.16(x).

On 5/18/2023 the following Indian tribes were notified about the Washington County Energy Facility Dual Fuel Conversion Project: Alabama-Quassarte Tribal Town, Muscogee (Creek) Nation, Muscogee (Creek) Nation National Council, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Thlopthlocco Tribal Town, Coushatta Tribe of Louisiana, Kialegee Tribal Town, and Seminole Tribe of Florida. No response to the notification was received from the Indian tribes.

The enclosed document titled, Georgia Historic Preservation Division (SHPO) Environmental Review Form describes the results of the investigation of the APE. While several archaeological sites have been documented within one mile of the APE, none are located within the APE. Based on the findings of the Environmental Review Form, a finding of no adverse effect in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Accordingly, the RUS is submitting a finding of no adverse effect in accordance with 36 CFR § 800.5(b) and supporting documentation for review and consideration by the Thlopthlocco Tribal Town. Please provide your concurrence or objection **electronically** within 30 days of your receipt of this recommended finding. In accordance with 36 CFR § 800.3(c)(4), RUS will proceed to the next step in review if we do not receive a response from you within thirty days. Please direct any questions you may have to Kristen Bastis at Kristen.Bastis@usda.gov.

Sincerely,

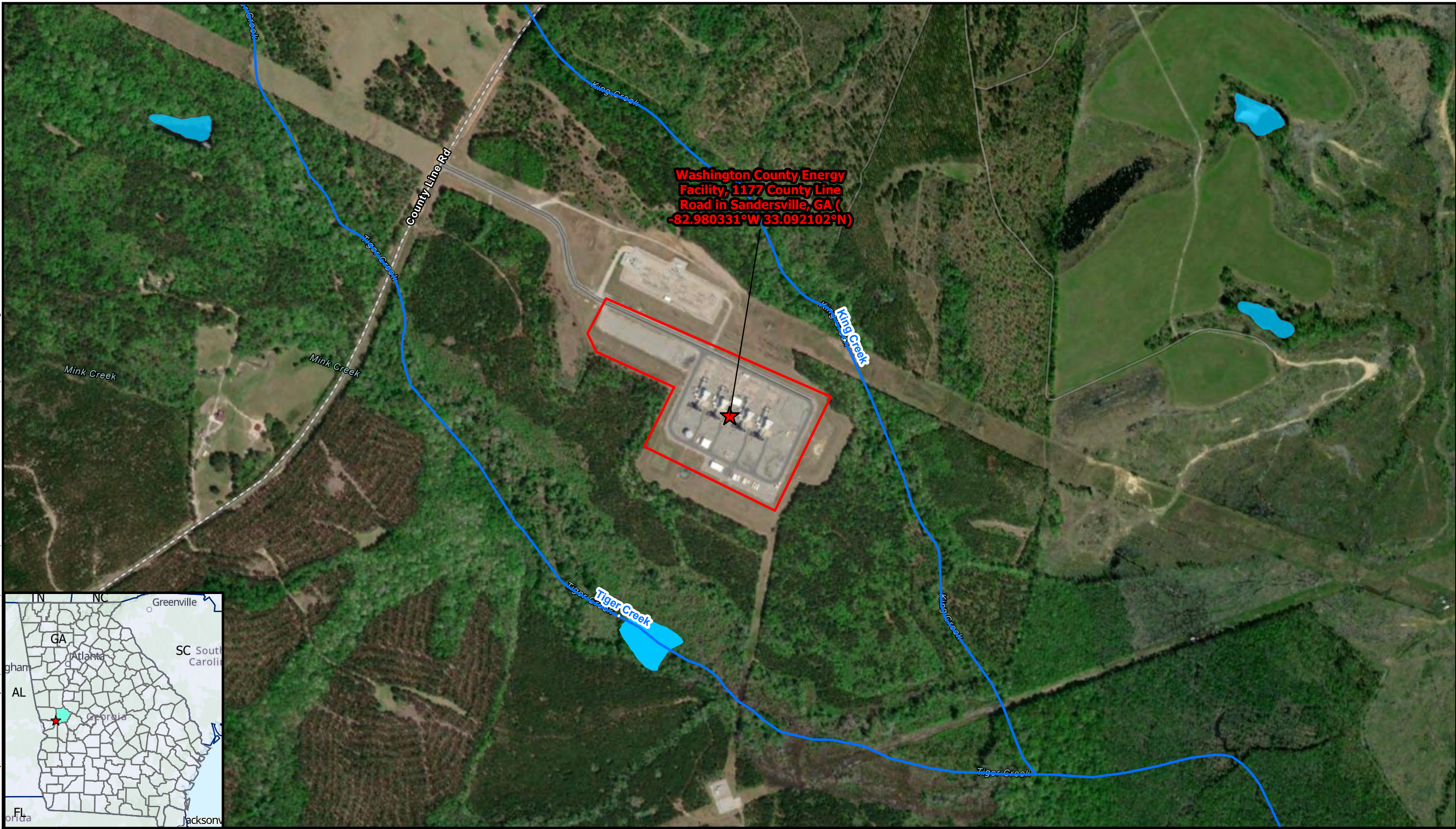
Kristen Bastis, MA, RPA

Archeologist
Rural Utilities Service, Rural Development, USDA

Enclosures

Project Map
GA SHPO Project Review Form

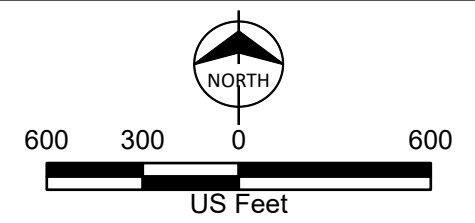
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Service Layer Credits: Hybrid Reference Layer: Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METIINASA, USGS, EPA, NPS, US Census Bureau, USDA



Washington County Energy Facility, 1177 County Line Road in Sandersville, GA (-82.980331°W 33.092102°N)

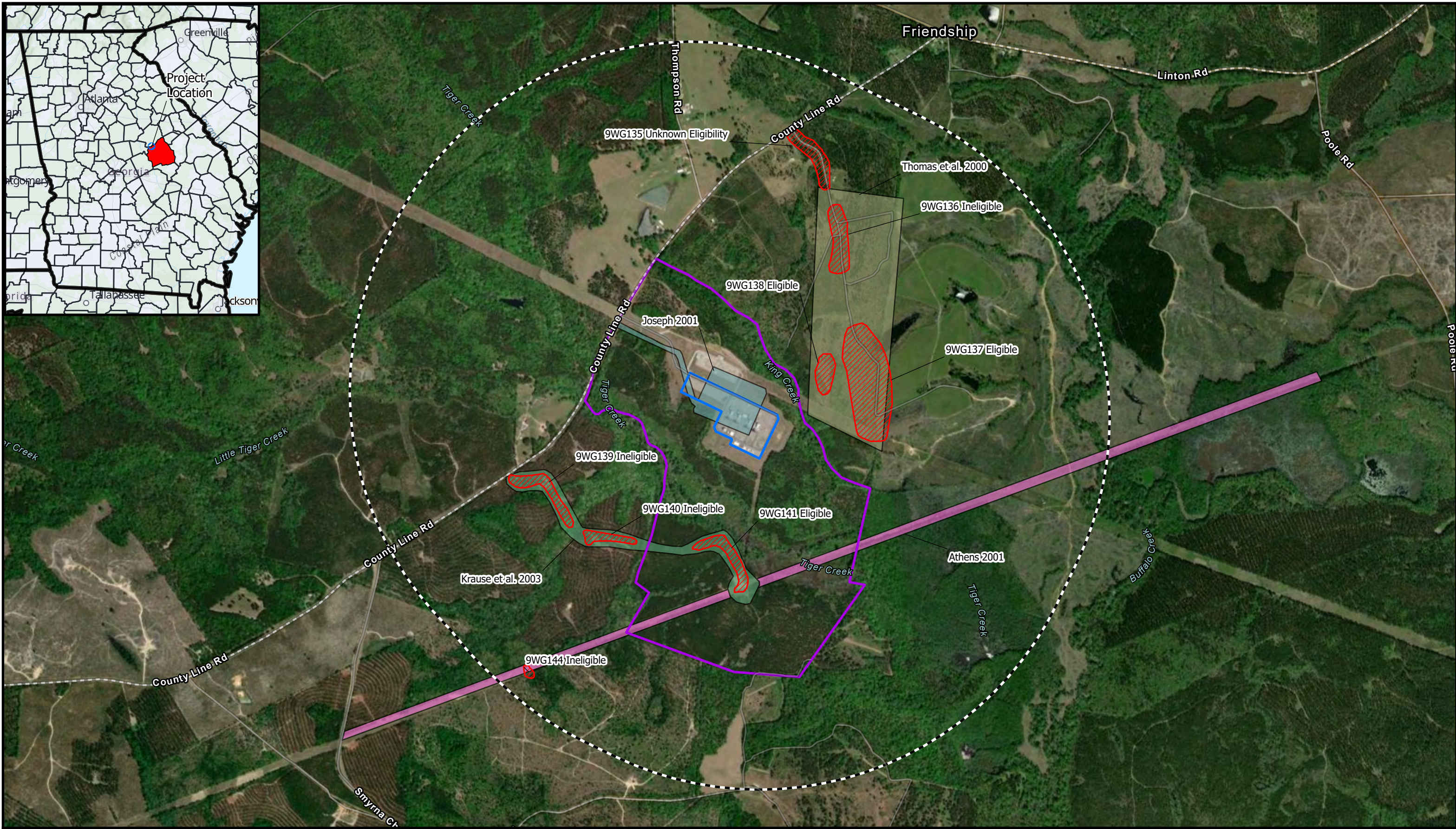


- ★ Washington County Energy Facility
- ▭ Property Boundary
- NHD Flowline
- Freshwater Pond



Project Location Map
Oglethorpe Power
Washington County Facility,
Dual Fuel Conversion Project
Oglethorpe Power Corporation
Washington County, GA

Path: C:\Users\mdcarlock\OneDrive - Burns & McDonnell\Documents\ArcGIS\Projects\Washington Dual Fuel CR.aprx mdcarlock 8/17/2023
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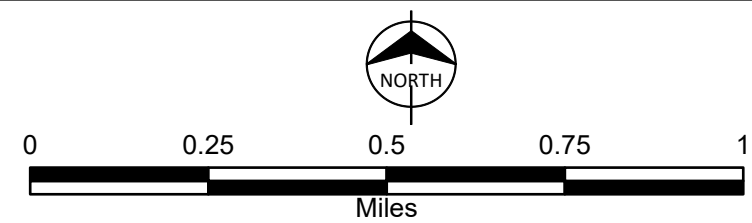


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 Oglethorpe Power Company
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HISTORIC PRESERVATION DIVISION

September 12, 2023

Michael Carlock
Senior Cultural Resources Specialist
Burns & McDonnell
4004 Summit Boulevard, Suite 1200
Atlanta, Georgia 30319

**RE: Upgrade Energy Facility, 1177 County Line Road, Sandersville
Washington County, Georgia
HP-230817-003**

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This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-230817-003** in any future correspondence regarding this project. If we may be of further assistance, please contact Michelle Bard, Environmental Review Historian, Michelle.Bard@dca.ga.gov or (770) 212-4888 or Noah Bryant, Compliance Review Archaeologist, at Noah.Bryant@dca.ga.gov or (404) 679-0649.

Sincerely,



Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Gregory Korosec, USDA/Rural Utilities Service
Anne S. Floyd, Central Savannah River Area Regional Commission
Tina Hutcheson, DCA Regional Services, Region 7

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I. General Information

A. Project Name: _Washington County Energy Facility Dual Fuel Conversion Project

Project Address: _1177 County Line Road

City: _Sandersville

County: _Washington County, Georgia

B. Federal Agency Involved: _USDA Rural Development (RD) Rural Utilities Service (RUS)

State Agency Involved (if applicable): _N/A

C. Agency's Involvement (check all that are applicable):

Funding (grant, loan, etc.)

License/Permit

Direct/Agency is performing the action

Unknown

Other, please explain:

D. Type of Review Requested:

Section 106 of the National Historic Preservation Act (Federal agency involvement)

Section 110 of the National Historic Preservation Act (Federally owned properties)

Georgia Environmental Policy Act (GEPA; State agency involvement)

State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)

Unknown

E. Contact Information: **Applicant** **Consultant**

Name/Title/Company: _Michael D. Carlock, Senior Cultural Resources Specialist, Burns & McDonnell

Address: _4004 Summit Boulevard, Suite 1200

City/State/Zip: _Atlanta, GA 30319

Phone: _470-527-3556

Email: _mdcarlock@burnsmcd.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _Gregory Korosec, Archaeologist, Rural Utilities Service, Rural Development, USDA

Address: _1400 Independence Avenue, S.W.

City/State/Zip: _Washington, D.C. 20250

Phone: _202-720-2662

Email: _Gregory.Korosec@usda.gov

II. Project Information

A. Project Type:

- | | |
|--|--|
| <input type="checkbox"/> Road/Highway Construction or Improvements | <input type="checkbox"/> Relicensing |
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All ground disturbance would occur within the existing footprint of the Washington County Energy Facility.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ____ NO X
**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ____ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES X NO ____
**If yes, are project plans/scope of work available yet? YES X NO ____*
**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- | | | |
|----------------------|----------|-------------|
| 1. Farming | YES ____ | NO <u>X</u> |
| 2. Pasture | YES ____ | NO <u>X</u> |
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| 4. Timbering | YES ____ | NO <u>X</u> |
| 5. Road construction | YES ____ | NO <u>X</u> |
| 6. Housing | YES ____ | NO <u>X</u> |
| 7. Landfill | YES ____ | NO <u>X</u> |
| 8. Commercial | YES ____ | NO <u>X</u> |
| 9. Industrial | YES ____ | NO <u>X</u> |
| 10. Other (explain): | _____ | |

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.):
The Washington County Energy Facility is located on the existing parcel. It was built by LG&E Power in 2002.

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES NO DO NOT KNOW (see: [http://www. https://georgiashpo.org/surveys](http://www.https://georgiashpo.org/surveys))

**If yes, provide the title, author, and date of the report:*

Joseph, J.W. 2001 Archaeological Survey of The Tiger Creek Gas Turbine Power Plant Washington County, Georgia

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.**

Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.):

The APE for this project includes the footprint of the existing modern facility and surrounding properties with a view of the project. The existing facility is a collection of modern energy generating structures that was built in 2002. The APE was the subject of an archaeological survey in 2001, by New South Associates.

Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?

YES NO DO NOT KNOW

**If yes, please provide names: N/A*

C. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older?

YES NO DO NOT KNOW

**If yes, provide current photographs of each building or structure and key the photos to a site map.*

D. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES NO DO NOT KNOW

**If yes, please identify the properties (by name or photo #).*

E. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES NO

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES NO

**If yes, please explain: N/A*

3. Will the project change the view from or of any of these properties? YES ___ NO X
**If yes, please explain:* N/A
4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES ___ NO X
**If yes, please explain:* N/A
5. Will the project result in a change of ownership for any historic properties? YES ___ NO X
**If yes, please explain:* N/A

V. Required Materials (Submittal Checklist)

- X Complete Environmental Review Form
 - o Include all contact information as HPD will respond via email to the submitter.
- X Map indicating:
 - o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
 - o In urban areas, please also include a city map that shows more detail
 - o Boundaries of the APE as noted in section II above
 - o Location of resources indicated in section IV.C through E
- X Detailed project plans to supplement section I.F, including (if applicable and available):
 - o Detailed scope of work
 - o Site plans (before and after)
 - o Project plans
 - o Elevations
- X High-resolution current color photographs (max 2 photos per page) illustrating:
 - o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E
 - o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable
 - o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
 - o ****Google Street view and publicly available Tax Assessor images will not be accepted**
- X Photography key (map or project plans can be used) indicating:
 - o Location of all photographs by photo number
 - o Direction of view for all photographs
- X Any available information concerning known or suspected archaeological resources in the APE.

Email submission of project materials is available at ER@dca.ga.gov.

Documents too large to send via email may be shared only through Microsoft OneDrive file sharing.

HPD no longer accepts project materials for review via mail, with the exception of archival mitigation documentation, as applicable.

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.

AGENCY RESPONSES



June 21, 2023

Sara Kent, Project Manager
Burns & McDonnell
4004 Summit Boulevard NE, Suite 120
Atlanta, GA 30319

Re: Executive Order 12372 Request for Washington Energy Facility, Washington County.

Dear Ms. Kent:

This letter replies to your request for information on the possible impacts the proposed new infrastructure for the facility may have on land use, conservation, water quality and other general environmental concerns that may be of interest to our agency. The following outlines our concerns with the proposed project with regards to farmland protection, and Natural Resources Conservation Service (NRCS) watershed dams and project easements.

Farmland Protection

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For FPPA purposes, farmland includes areas located within soil map units rated as prime farmland, unique farmland, or land of statewide or local importance not currently in urban/built up land use. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land uses, but not water or urban built-up land. It should be noted that the FPPA does not authorize the Federal Government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. It is our understanding that the proposed project involves federal funds or assistance, and thus could be subject to this assessment. **However, this project does not convert farmland and is thus exempt from this assessment. You need take no further action for FPPA purposes.**

NRCS Watershed Dams

More than 50 years ago, the U.S. Department of Agriculture was authorized by Congress to help local communities with flood control and watershed protection through the Watershed Program (PL-534 Flood Control Act of 1944 and PL-566 Watershed Protection and Flood Prevention Act). As a result, local communities, with NRCS assistance, have constructed over

Natural Resources Conservation Service

Georgia State Office
355 East Hancock Avenue - Athens, GA - 30601-2775
Voice: 706-546-2272 Fax: 855-417-8490

11,000 dams in 47 states since 1948. These dams were originally constructed for protection of farmlands from flooding impacts. In 2000, PL-566 was amended to provide NRCS authorization to assist communities with rehabilitation of their aging dams. The legislation authorizes NRCS to work with local communities and watershed project sponsors to address public health and safety concerns and potential environmental impacts of aging dams.

We have reviewed our records and have determined that there are no such structures downstream of the proposed project that could be affected by these activities.

NRCS Easements

NRCS easements relate to our Wetland Reserve Program and the Farm and Ranchland Protection Program. **We have reviewed our records and have determined that there are no such easements downstream or in the near vicinity of the proposed project that could be affected by these activities.**

NRCS appreciates this opportunity to comment. If you have questions or need any additional information, please contact me at (706) 654-2056 or nelson.velazquezgotay@usda.gov.

Sincerely,

NELSON A. VELÁZQUEZ GOTAY
SOIL SCIENTIST

cc: Jack Lewis, Assistant State Conservationist (FO), NRCS, Athens, GA
Kelli Coleman, District Conservationist, NRCS, Washington, GA
Jason Wheatley, Resource Soil Scientist, NRCS, Athens, GA

Kent, Sara S

From: GAES Assistance, FW4 <gaes_assistance@fws.gov>
Sent: Tuesday, May 23, 2023 4:24 PM
To: Long, Madeline R
Cc: Kent, Sara S
Subject: Re: [EXTERNAL] 2023-0084973 Washington Co.

Madeline,

thank you for providing us the consistency letter generated by our IPAC system. You don't need anything further from us as long as the scope of the project doesn't change. Please let me know if you have any questions.

thank you,
Sandy Abbott
Sandy_Abbott@fws.gov

Georgia Ecological Services
U.S. Fish and Wildlife Service
GAES_Assistance@FWS.gov
www.fws.gov/office/georgia-ecological-services/
Check out our new [project review](#) and [conservation tools](#) pages!
[ESA 50th Anniversary - More Important than Ever](#)

Note: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

From: Long, Madeline R <mrlong@burnsmcd.com>
Sent: Tuesday, May 23, 2023 11:45 AM
To: GAES Assistance, FW4 <gaes_assistance@fws.gov>
Cc: Kent, Sara S <sskent@burnsmcd.com>
Subject: [EXTERNAL] 2023-0084973 Washington Co.

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good morning,

I'm reaching out in regard to the automated reply that was sent from U.S. Fish and Wildlife Services's Georgia Ecological Services Field Office in response to the scoping letter sent on behalf of our client, Oglethorpe Power Company (Oglethorpe).

Per the instructions attached to the automated response, I have completed, and attached, the IPaC Report and Consistency Letter for Oglethorpe's Dual Fuel Conversion Project (Project) at the Washington County Energy Facility. The Project site is located at 1177 County Line Rd, at the following coordinates: -82.980331°W 33.092102°N.

I've also attached a Project description that includes the requested effects determination and conservation measures.

In summary, no impacts to natural resources are anticipated as a result of this Project; thus, no mitigation measures have been proposed.

Please reach out if you have any questions.

Thank you for your time and consideration, and I look forward to hearing from you.

Best,
Madeline

Madeline Long \ Burns & McDonnell
Assistant Environmental Scientist
o +1 470-548-7631
mrlong@burnsmcd.com \ burnsmcd.com
4004 Summit Blvd. | Suite 1200 | Atlanta, GA 30319

Kent, Sara S

From: Carlock, Michael D
Sent: Monday, September 11, 2023 11:31 AM
To: Michelle.Bard@dca.ga.gov
Cc: Kent, Sara S; Burnham, Grant M; Long, Madeline R
Subject: RE: question about Washington County Energy Facility project

Hello Michelle,

Thank you for your response. The tanks will be 48 feet high. Approximately the same as the existing facility. Please let me know if you have further questions.

Thanks again,

Mike Carlock
(470) 579-3556

From: Long, Madeline R <mrlong@burnsmcd.com>
Sent: Monday, September 11, 2023 9:54 AM
To: Carlock, Michael D <mdcarlock@burnsmcd.com>
Cc: Kent, Sara S <sskent@burnsmcd.com>; Burnham, Grant M <gmburnham@burnsmcd.com>
Subject: Re: question about Washington County Energy Facility project

Hi Mike,

The DEMIN water tank and No. 2 dual fuel tank are both 100 ft ID (inside dimension) x 48 ft High Cone Roof tanks.

Please let me know if you need any additional information!

Thank you,
Maddy

Madeline Long \ Burns & McDonnell

Assistant Environmental Scientist

o +1 470-548-7631

mrlong@burnsmcd.com \ burnsmcd.com

4004 Summit Blvd. | Suite 1200 | Atlanta, GA 30319

From: Burnham, Grant M <gmburnham@burnsmcd.com>
Sent: Monday, September 11, 2023 7:43 AM

To: Carlock, Michael D <mdcarlock@burnsmcd.com>; Long, Madeline R <mrlong@burnsmcd.com>

Cc: Kent, Sara S <sskent@burnsmcd.com>

Subject: RE: question about Washington County Energy Facility project

Adding Sara so she is in the loop.

Thanks,

Grant Burnham

Senior Environmental Scientist

Burns & McDonnell

☎ 470-548-7702 \ M 770-490-9212

***Upcoming PTO 9/25 – 9/29, 10/6, and 10/9**

From: Carlock, Michael D <mdcarlock@burnsmcd.com>

Sent: Friday, September 8, 2023 4:26 PM

To: Burnham, Grant M <gmburnham@burnsmcd.com>; Long, Madeline R <mrlong@burnsmcd.com>

Subject: FW: question about Washington County Energy Facility project

Hi guys,

Please see below. Can you let me know those heights and I will let SHPO know asap.

Thank you!

Mike Carlock
(470) 579-3556

From: Michelle Bard <Michelle.Bard@dca.ga.gov>

Sent: Friday, September 8, 2023 3:31 PM

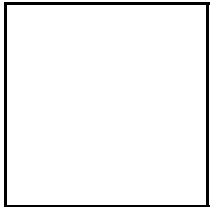
To: Carlock, Michael D <mdcarlock@burnsmcd.com>

Subject: question about Washington County Energy Facility project

Hello Mr. Carlock,

I am currently reviewing the project at the above referenced facility. I see that two tanks are to be installed on site: a demineralized water storage tank and a No. 2 diesel fuel oil tank. For our review, we need to know the overall height of each tank. Please respond with that information as soon as you are able.

Regards,



Learn more about our commitment to [fair housing](#).

Michelle Bard

Environmental Review Historian

Georgia Department of Commu

60 Executive Park, NE

Atlanta, Georgia 30329

Direct +17702124888

Michelle.Bard@dca.ga.gov

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