



Final Environmental Assessment: Rivian Stanton Springs North

Department of Energy Loan Programs Office –
Advanced Technology Vehicles Manufacturing

December 2024



DOE/EA-2251

CONTENTS

1.	PURPOSE AND NEED	1
1.1	Purpose and Need for Agency Action	1
1.2	Background.....	1
1.3	Scope of Environmental Assessment	1
	1.3.1 Project Site Development and Preparation by Others.....	1
	1.3.2 Project Site Development and Preparation by Rivian	2
1.4	Public Involvement	7
2.	DESCRIPTION OF THE PROPOSED ACTION.....	8
2.1	Construction.....	11
	2.1.1 Construction of Project Structures and Equipment Installation	11
	2.1.2 Project Schedule.....	12
2.2	Operation	12
	2.2.1 Manufacturing Operations.....	12
	2.2.2 Staffing and Operational Timeframe	16
	2.2.3 Shipping and Receiving	16
	2.2.4 Material and Waste Management	17
3.	ENVIRONMENTAL CONSEQUENCES.....	20
3.1	Introduction	20
3.2	Cultural Resources	20
	3.2.1 Native American Interests.....	21
3.3	Water Resources	21
	3.3.1 Operational Water Usage	21
3.4	Air Quality	21
3.5	Noise.....	24
	3.5.1 Applicable Standards and Existing Conditions.....	24
	3.5.2 Noise Analysis	25
3.6	Transportation.....	29
	3.6.1 Off-Site LOS	29
	3.6.2 Project Trip Generation.....	29
	3.6.3 Transportation Impacts from Construction	30
	3.6.4 Transportation Impacts during Operations.....	30
	3.6.5 On-Site LOS from Operation (Phases 1 and 2)	31
3.7	Socioeconomics and Environmental Justice.....	33
	3.7.1 Socioeconomics.....	33
	3.7.2 Environmental Justice.....	35
3.8	Health and Safety	42
3.9	Waste Management.....	43
	3.9.1 Construction.....	43
	3.9.2 Operations	43
3.10	Cumulative Impacts	44
	3.10.1 Water Supply and Wastewater Treatment	45
	3.10.2 Air Quality and Climate Change.....	46
	3.10.3 Transportation.....	48
	3.10.4 Socioeconomic and Environmental Justice.....	48

4.	FINDING OF NO SIGNIFICANT IMPACT	50
5.	LIST OF AGENCIES CONTACTED	51
6.	LIST OF PREPARERS	52
6.1	U.S. Department of Energy	52
6.2	Rivian.....	52
6.3	ERM Consulting & Engineering, Inc (Consultant to Rivian)	52
7.	REFERENCES	54
APPENDIX A	AGENCY AND TRIBAL CONSULTATION	
APPENDIX B	PERMITS AND APPROVALS	
APPENDIX C	ENVIRONMENTAL COMPLIANCE MEASURES	
APPENDIX D	PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT	

List of Tables

Table 1.	Project Schedule – Phase 1.....	12
Table 2.	Potable and Reclaimed Water Supply and Project Demand	16
Table 3.	Anticipated Site Setting (Phase 1)	16
Table 4.	Inbound and Outbound Materials.....	17
Table 5.	Estimated Wastewater Discharge from Manufacturing Operations.....	18
Table 6.	Project Stationary Storage Tanks upon Completion of Phase 2	19
Table 7.	Projected Waste Generation and Disposal.....	19
Table 8.	Summary of CAMP Monitoring Action Levels.....	22
Table 9.	Project Potential to Emit.....	23
Table 10.	Identified Noise-Sensitive Areas	25
Table 11.	Calculated Average Construction Noise Levels with the Minimum and Maximum Amount of Equipment in Operation	26
Table 12.	Noise Model Results	28
Table 13.	Modeled Rail Yard Noise	28
Table 14.	Project Trip Generation Estimates	30
Table 15.	Project Build Average Intersection Level of Service (Ingress/Egress)	31
Table 16.	Population, Ethnicity, and Income.....	35
Table 17.	Secondary Socioeconomic Indicators.....	37
Table 18.	EPA EJScreen Indicators for Project Area	39
Table 19.	Project Annual Chemical/Materials Usage	42

List of Figures

Figure 1.	Project Site Location Map.....	3
Figure 2.	Project Site with Satellite Imagery	4
Figure 3.	Project Site Topographic Map	5
Figure 4.	Project Site Layout.....	10
Figure 5.	Operational Noise Locations.....	27
Figure 6.	Site Access Points	32
Figure 7.	Environmental Justice Population Census Block Group Locations.....	36
Figure 8.	Environmental Justice Secondary Indicators Census Block Group Locations	38
Figure 9.	EJSCREEN Indexes in the 80 th Percentile and Above.....	40
Figure 10.	Adjacent Properties Figure	47

List of Exhibits

Exhibit 1. Manufacturing Process 14

Acronyms and Abbreviations

Acronym	Definition
AC	alternating current
AGL	above ground level
ATVM Program	Advanced Technology Vehicle Manufacturing Program
BMP	best management practice
CAA	Clean Air Act
CAMP	Community Air Monitoring Program
CBG	Census Block Group
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
CR	County Road
CUP	central utility plant
dB	decibel
dBA	A-weighted decibel
DC	direct current
DOE	U.S. Department of Energy
EA	Environmental Assessment
EDA	Economic Development Agreement
EHS	Environment, Health, and Safety
EJ	environmental justice
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
EPD	Environmental Protection Division
EV	electric vehicle
EVOEM	electric-vehicle original-equipment manufacturing
GDEcD	Georgia Department of Economic Development
GDOT	Georgia Department of Transportation
GHGs	greenhouse gases
Guideline	Guideline for Ambient Impact Assessment of TAPs
HAPs	hazardous air pollutants
HVAC	heating, ventilation, and air-conditioning
I	Interstate
IGA	Intergovernmental Lease Agreement
kV	kilovolt
L _{dn}	day-night sound level
LOS	level of service
LPO	Loan Programs Office
NAAQS	national ambient air quality standards
NSA	noise-sensitive area
NATA	National-Scale Air Toxics Assessment

Acronym	Definition
NCWSA	Newton County Water and Sewerage Authority
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO _x	nitrogen oxides
PA	Programmatic Agreement
PILOT	payment in lieu of taxes
PM _{2.5}	particulate matter with a diameter of less than 2.5 micrometers
PM ₁₀	particulate matter with a diameter of less than 10 micrometers
PSM	process safety management
Rivian	Rivian New Horizon, LLC
RMP	Risk Management Program
RTO	regenerative thermal oxidizer
SHPO	State Historic Preservation Officer
SIP	state implementation plan
SO ₂	sulfur dioxide
State	State of Georgia
TAP	toxic air pollutant
USACE	U.S. Army Corps of Engineers
VOCs	volatile organic compounds
WWTP	wastewater treatment plant

1. PURPOSE AND NEED

1.1 Purpose and Need for Agency Action

The purpose and need for agency action is to comply with the U.S. Department of Energy (DOE) mandate under Section 136 of the Energy Independence and Security Act of 2007 and select projects for financial assistance that are consistent with the goals of the act.

Rivian New Horizon, LLC (Rivian), has applied for a loan pursuant to DOE's Advanced Technology Vehicle Manufacturing Program (ATVM Program), which was created by the Energy Independence and Security Act of 2007 to provide incentives for projects that retrofit, expand, or create manufacturing facilities in the United States for advanced-technology vehicles or qualifying components; included in the incentives are the associated engineering costs. The primary goal of the ATVM Program is to improve fuel economy for light-duty vehicles and thereby reduce emissions of ozone precursors, greenhouse gases (GHGs), and particulate matter. The ATVM Program is designed to stimulate the technology required to meet program objectives.

Rivian is proposing to build a new electric-vehicle original-equipment manufacturing (EVOEM) facility and ancillary infrastructure for automotive applications, which will reduce air emissions such as ozone precursors, particulate matter, and GHGs that contribute to global warming, consistent with the primary goal of the ATVM Program. Financially supporting the Project will help Rivian bring 400,000 electric vehicles (EVs) to market and into greater use, thereby reducing overall national emissions of air pollutants and human-caused GHGs.

1.2 Background

The ATVM Program is administered by DOE's Loan Programs Office (LPO), which originates, underwrites, and services loans to eligible automotive and component manufacturers. This allows the manufacturers to finance the cost of reequipping, expanding, or establishing the manufacturing facilities in the United States that will produce advanced-technology vehicles and qualifying components, along with the cost of associated engineering integration performed in the United States.

To fund its new manufacturing facility, Rivian has applied to the DOE ATVM Program for financial assistance. After review of Rivian's application by the DOE LPO, the application was determined to be substantially complete, per the rules governing the ATVM Program in 10 Code of Federal Regulations (CFR) Part 611. Rivian was subsequently invited to enter into the LPO's due diligence process.

1.3 Scope of Environmental Assessment

1.3.1 Project Site Development and Preparation by Others

On April 26, 2022, the Joint Development Authority of Jasper County, Morgan County, Newton County and Walton County (together, the JDA) approved the Economic Development Agreement for the Project, which, among other things, would require the Georgia Department of Economic Development (GDEcD) and the JDA to obtain the required permits and prepare the site for the EVOEM facility. On April 29, 2022, GDEcD, in conjunction with the JDA, submitted a Clean Water Act Section 404 permit application to the U.S. Army Corps of Engineers (USACE), Savannah District, for development of an approximately 15-million-square-foot EVOEM facility

on a 2,003.23-acre site. USACE completed a Memorandum for Record (i.e., Environmental Assessment [EA] and Finding of No Significant Impact) and issued Army Permit No. SAS-2020-00182 on December 27, 2022 (see Appendix C).

In accordance with USACE Permit No. SAS-2020-00182 and other applicable permits and authorizations (see Appendix C), GDEcD/JDA initiated site development activities that involved course grading plans, cut and fill, soil preparation, initial site grading, temporary access roads, and development of 11 stormwater retention and detention features. The work being performed by GDEcD/JDA is not subject to federal financial assistance by LPO; therefore, it is not part of the Proposed Action under review by LPO.

Effective November 9, 2023, Rivian acquired possession of the Project site; however, Rivian will not initiate the improvements that are the subject of this EA until GDEcD and JDA complete their site development activities. In parallel with development of the site by GDEcD/JDA and Rivian, the Georgia Department of Transportation (GDOT) will be completing transportation improvement projects on the site, including improvements involving the Interstate (I) 20 at County Road (CR) 249/Old Mill Road interchange and the addition of an I-20 Frontage Road. It should be noted that the GDOT improvement projects are separate from the Proposed Action; the projects are intended to improve the surrounding infrastructure for all users, including local communities. The work being performed by GDOT is not subject to federal financial assistance by LPO; therefore, it is not part of the Proposed Action under review by LPO.

1.3.2 Project Site Development and Preparation by Rivian

LPO is preparing this EA to address issues regarding Rivian's construction of a new EVOEM facility as well as ancillary infrastructure on a 1,744-acre site that has been developed by GDEcD/JDA. The Project site is 40 miles east of Atlanta in the business park development of Stanton Springs North, within Morgan and Walton Counties, Georgia, as shown in Figures 1, 2, and 3. DOE is preparing this EA to comply with the National Environmental Policy Act (NEPA), the Council on Environmental Quality NEPA implementing regulations (40 CFR Parts 1500–1508), and the DOE NEPA implementing procedures (10 CFR Part 1021)¹. If no significant impacts are identified during preparation of this EA, DOE will issue a Finding of No Significant Impact. If potentially significant impacts are identified, DOE will prepare an environmental impact statement.

As discussed in Section 1.3.1, above, the Project site has been developed by GDEcD and JDA in accordance with already-acquired permits and approvals. Rivian will be responsible for final site grading, building construction, and equipment installation. Several factors influenced the scope of issues analyzed in this EA, including the previous EA completed for development at the Project site by USACE and the current status of applicable permits and approvals. The scope of the review completed by USACE for the 2,003.23-acre Project site encompasses the construction activities associated with development of the 1,744-acre Rivian Project site, which is the subject of the federal financial assistance (loan) under consideration by LPO; therefore, DOE's NEPA review incorporates by reference the review and conclusions associated with Permit No. SAS-2020-00182 (see Appendix C).

As presented in Section 1.3 in the USACE Memorandum for Record (see Appendix C), the scope of the USACE review encompassed proposed construction of an approximately 15-million-square-foot EVOEM facility that would manufacture and distribute EVs; a new Frontage Road was also included. The facility's vehicle production components would accommodate various manufacturing processes, including pressing, fabrication, painting, product completion/assembly, and the production of special products.

¹The DOE LPO is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, the DOE has nonetheless elected to follow those regulations at 40 CFR Parts 1500–1508, in addition to the DOE's procedures/regulations implementing NEPA at 10 CFR Part 1021, to meet the agency's obligations under NEPA, 42 United States Code (U.S.C.) Sections 4321 et seq.

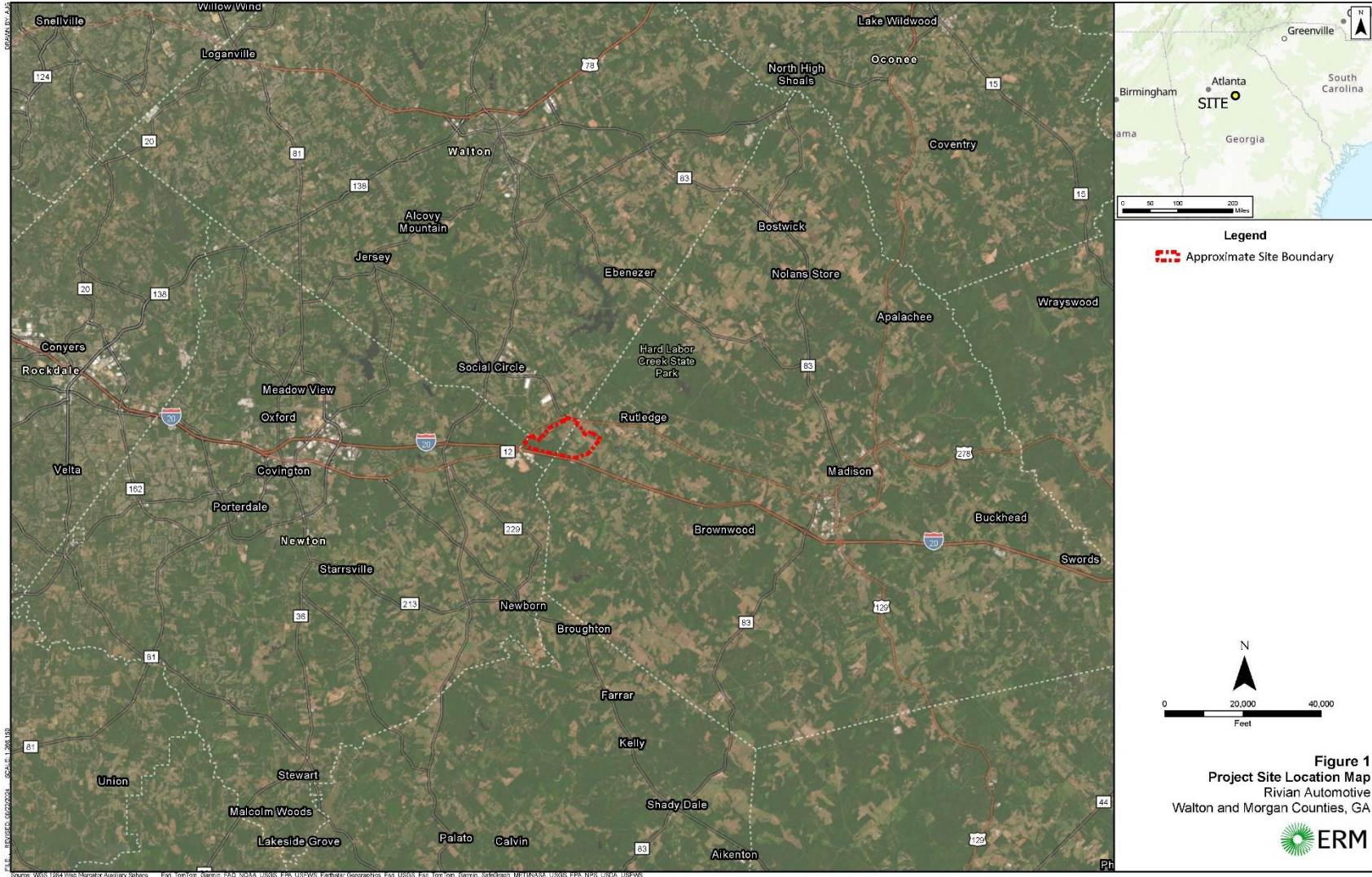


Figure 1. Project Site Location Map

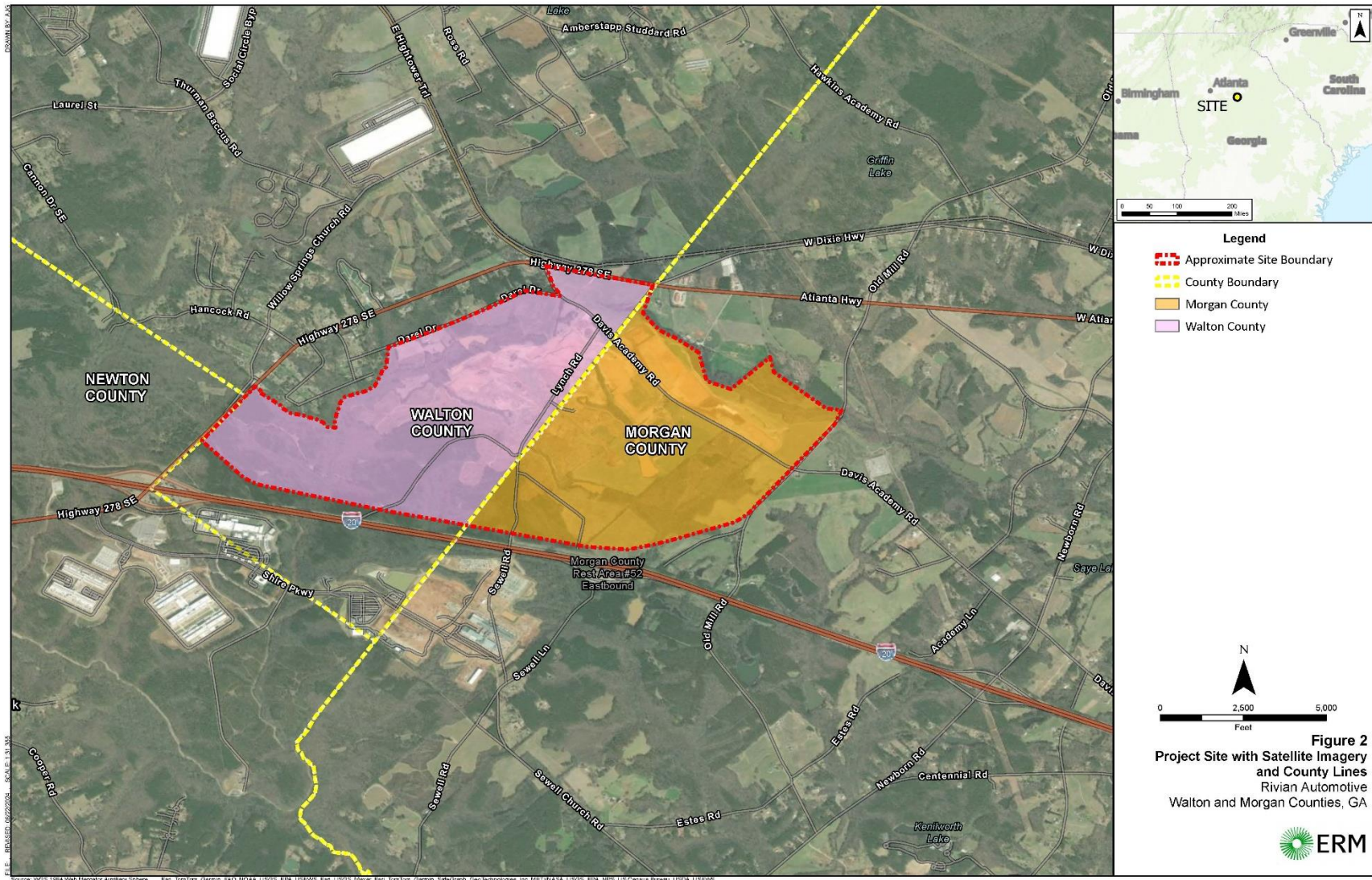


Figure 2. Project Site with Satellite Imagery



Figure 3. Project Site Topographic Map

The required distribution components would include a train yard, truck yard, and finished product yard. The EVOEM complex would also include components related to employee services; these would support the large workforce through food services, medical facilities, employee parking, training facilities, and administrative workspaces. The storage component would include the central storage building and a liquid storage building. The testing and quality assurance facilities would include a product testing area, testing station, and the other miscellaneous buildings required for quality assurance support. Additional components would include waste facilities, security facilities, utility facilities, and supplier facilities. In addition, Section 7.0, General Public Interest, in the USACE Memorandum for Record (see Appendix C), the following resources were reviewed:

- Aesthetics
- Wetlands
- Fish and wildlife
- Flood hazards and floodplains
- Land use
- Soil erosion and sedimentation
- Water quality (water resources)

After review, USACE concluded that no adverse impact, a neutral impact, or a negligible adverse impact would occur.

LPO has reviewed the USACE findings and concurs that the impacts would not be significant; therefore, the resources listed above are not included in the scope of this EA. The scope of LPO's review will be on the operational aspects of the Rivian project. Based on LPO's review of the scope of the Proposed Action, existing site conditions, preconstruction permitting, and the prior USACE EA and Finding of No Significant Impact, the following resource areas could be affected by the Project:

- Cultural resources, including tribal concerns
- Air quality
- Transportation
- Operational water usage
- Noise
- Socioeconomic and environmental justice
- Public and occupational health and safety
- Waste management

Because the above resource areas could be affected by the Project, each was assessed to identify the nature, extent, and significance of those impacts (see Section 3). This EA also examines the direct, indirect, and cumulative effects of the Project. The assessment combined desktop research and analysis of existing available information with select field studies, including site assessments related to the scope of this Project.

1.4 Public Involvement

The Draft EA and FONSI was released for a 30-day public comment period from October 3, 2024, through November 3, 2024. The EA was posted on the DOE LPO's NEPA-Related Public Involvement website. The website also provided an email address for reviewers to submit comments. Comments on the EA were received from two individuals. The comments submitted included eight emails, 12 photos, and two videos for LPO's consideration. The nature of the comments received was as follows:

- US Army Corps of Engineers (USACE) Environmental Assessment and Finding of No Significant Impact
- Lithium battery manufacturing
- Water Quality: Zoning requirements for Wastewater pretreatment and hazardous materials
- Payments in Lieu of Taxes (PILOT)
- Comments on Resource Areas (Socioeconomics, Noise, Air Quality, Transportation, Cumulative)
- Non-Technical and Outside the Scope of the LPO Environmental Review
- Level of NEPA Review

LPO responses to comments can be found in Appendix D.

2. DESCRIPTION OF THE PROPOSED ACTION

Under the Proposed Action, the DOE LPO will issue a loan to Rivian for the Project, which consists of development of an EV manufacturing facility 40 miles east of Atlanta, Georgia, in the northern portion of the Stanton Springs Business Park economic development zoning district. The Project property is owned by the State of Georgia (State). The State leases the Project property to the JDA, pursuant to an Intergovernmental Lease Agreement (IGA) dated September 2, 2022. Rivian, the State, and the JDA are parties to an Economic Development Agreement (EDA) dated May 2, 2022, as amended, in which Rivian agrees to satisfy certain performance metrics in connection with the Project property in exchange for State and local incentives. Pursuant to the EDA, Rivian, the State, and JDA closed on the Project property on November 9, 2023, and Rivian and the JDA entered into a Rental Agreement whereby Rivian will rent the Project property from the JDA for an initial term of 25 years, with an option to renew for an additional 25 years, in accordance with the Rental Agreement. The EDA further provides Rivian the option to purchase the Project property at any time after full execution of the Rental Agreement.

The 1,744-acre Project site consists of 44 parcels of land, which have been combined into two tracts in the vicinity of I-20 and U.S. 278 in Walton County and Morgan County, Georgia. The Project site, as part of the Stanton Springs Business Park, is zoned Industrial General. The manufacturing facility will produce Rivian's midsize platform of vehicles. The EV manufacturing facility will consist of two production capacity blocks, with each block producing up to 200,000 vehicles per year. Phase 1 of the Project involves the structures, utilities, tooling, and initial inventory needed for the first production capacity block, resulting in the production of 200,000 vehicles per year upon completion. Phase 2 of the Project involves the structures, utilities, and tooling needed for the second production capacity block, with total vehicle production reaching 400,000 vehicles per year upon completion.

The following description of the Proposed Action encompasses the entire Project (Phase 1 and 2); Section 3 includes impact analyses for the entire Project.

Within the 1,744-acre Project site, approximately 1,000 acres will be developed at Project completion (Phases 1 and 2). Approximately 250 acres will be for structures, approximately 80 acres for workforce parking, 43 acres for stormwater management features, 20 acres (13.5 miles) for roads, 4.5 acres for water pre-treatment and a wastewater treatment plant (WWTP), 1.5 acres for the central utility plant (CUP) and central tank farm, and 50 acres for an outbound product rail yard and rail spur. The remaining development will include landscaping and areas set aside for potential future expansion (beyond Phase 1 and 2 of the LPO Proposed Action). The developed areas will include various manufacturing and assembly buildings, roads and parking areas, storage areas, a rail yard, an electrical substation, a wastewater treatment facility, a central tank farm, tractor-trailer shipping and receiving facilities, the CUP, and hazardous material storage. The rail spur connection (approximately 0.65 mile long) will be developed by CSX Transportation from the existing CSX Georgia Railroad mainline under U.S. 278 to the Project site. Rivian will be responsible for grading in preparation for the spur on the Project site as well as a connecting rail spur (approximately 0.4 mile long) from the rail yard to a new CSX rail spur.

The primary structures will be approximately 40 feet above ground level (AGL), except for the stamping shop, which will be approximately 76 feet AGL. All structures will fall below the Federal Aviation Administration requirement of 200 AGL.

The following is a list of the primary buildings/operational areas on the Project site:

- Stamping shop: 186,000 square feet (sq ft)
- Body shop: 767,500 sq ft
- Paint shop: 770,000 sq ft
- Parts preparation, general assembly, and end of line: 1,985,000 sq ft
- Battery assembly: 480,000 sq ft
- Drive unit: 583,000 sq ft
- Front entry and workplace: 170,000 sq ft
- Automated storage and retrieval system: 49,600 sq ft
- Parking lots: 2,200,000 sq ft
- Outbound lot: 2,200,200 sq ft
- Rail yard: 2,100,000 sq ft
- WWTP: 66,500 sq ft
- Substation: 280,000 sq ft
- CUP: 79,300 sq ft
- General assembly tank farm: 2,500 sq ft
- Battery adhesive tank storage: 9,800 sq ft
- High-purity water treatment (located in paint shop): 7,200 sq ft

The Project site layout is illustrated in Figure 4.

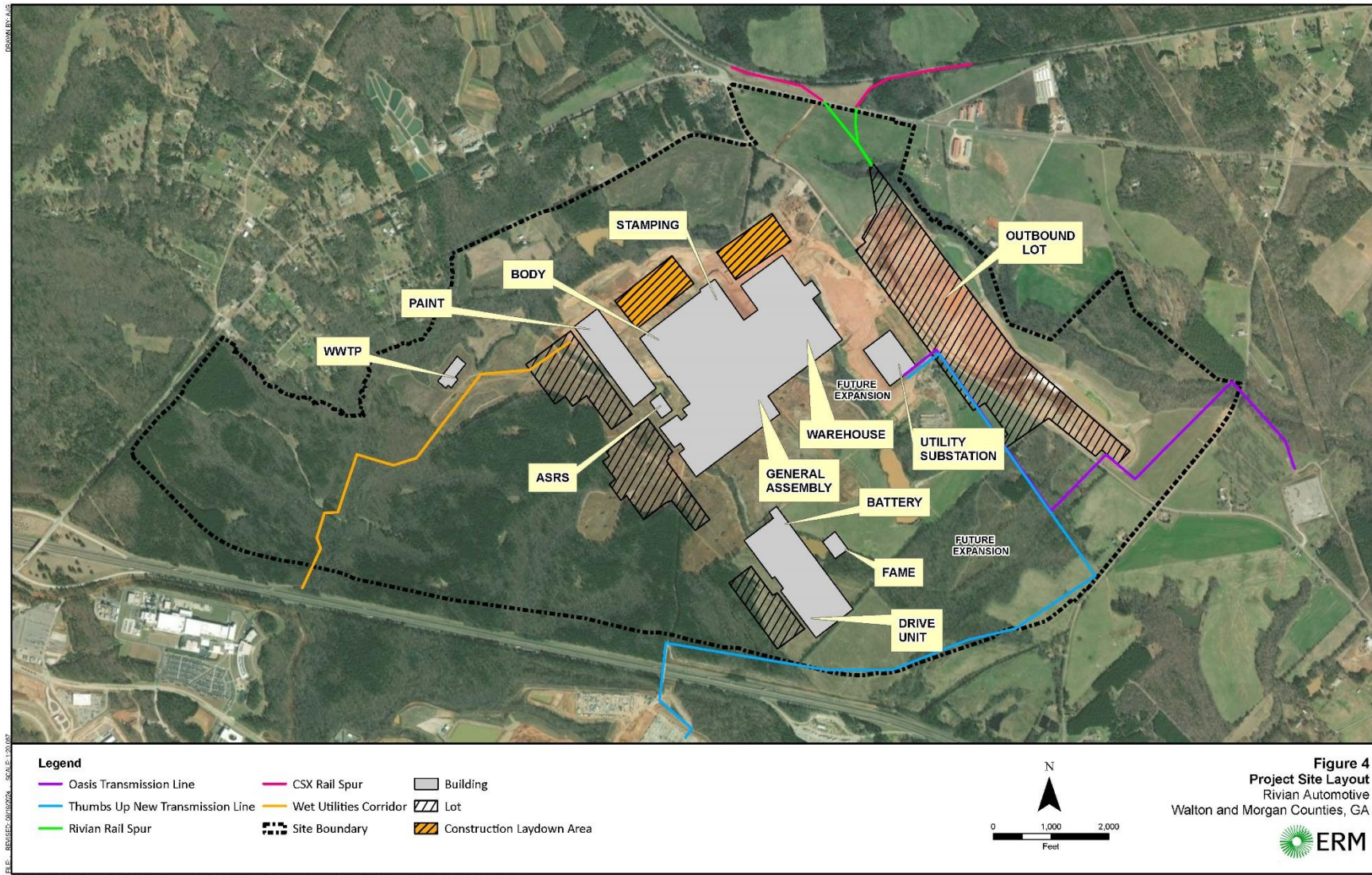


Figure 4. Project Site Layout

2.1 Construction

The Project will rely upon multiple pad locations. These will be used for equipment laydown areas as well as supply delivery and staging areas during construction. Laydown areas are planned for the land north of the body shop footprint and north of the warehouse footprint. Construction trailers will be located north of the footprint for the stamping shop. Laydown area use will depend on site conditions and sequencing. Access to the laydown areas for equipment and supply deliveries will be primarily from the main access roadway (U.S. 278) on the southern part of the property but occasionally from Old Mill Road, for those approaching from the east, until Frontage Road is completed. The Frontage Road will be a main entry point for the southern and eastern parts of the site.

It is estimated that up to 2,000 vehicles belonging to employees and construction workers will be on-site each day during the construction phase of the Project. Nearly all of the vehicles will be there during the day shift. Therefore, Project construction will result in approximately 4,000 trips per day to and from the Project site. The construction workforce is expected to be constant throughout the Project.

2.1.1 Construction of Project Structures and Equipment Installation

The four main manufacturing buildings will encompass approximately 5 million square feet. The largest building, a single structure for parts preparation, general assembly, and end of line, will measure approximately 2,200 feet long by 900 feet wide. It will have a poured concrete slab floor, an internal steel-frame structure to reduce the number of interior posts, and an insulated metal exterior. The facility's main buildings will house areas for manufacturing operations (e.g., vehicle body, paint shop, general assembly, parts preparation, end of line, battery assembly, drive-unit assembly). Additional details on the facility's proposed operations are available in Section 2.2.

Other site structures and ancillary features will include the workforce parking areas, WWTP, substation and CUP, and rail spur, in addition to the four primary buildings.

Construction in the 15-acre CUP and utility corridor will occur concurrently with construction on the Project site. This work will provide the infrastructure necessary for potable water, reclaimed water, sanitary sewer flows, and industrial wastewater. Construction of the CUP will also involve the installation of chillers, hot-water units for heating, air compressors, and facility heating, ventilation, and air-conditioning (HVAC) systems. Storage tanks for process fluid from general assembly will be installed between the CUP and the general assembly building. Process fluid storage for the battery assembly and drive unit will be east of the general assembly building. Off-pad utility construction is slated to begin in the first half of 2025. Water and wastewater mains will connect to the Newton County system. The potable water, reclaimed water, and sewer lines will be adjacent to the Frontage Road right-of-way. The point of connection will be on the west side of Dennis Creek, with an encased crossing at I-20.

Electric and data/fiber utility lines will be installed by the local utility companies to the substation and the demarcation points, respectively. The on-site 230-kilovolt (kV) electrical substation, to be owned, operated, and constructed by Georgia Transmission Company, will be centrally located on the site south of the outbound lot and rail yard. The substation will connect to both the existing Oasis 230 kV substation on Davis Academy Road, east of Old Mill Road, from a 1.6-mile-long transmission line and the Morning Hornet substation, south of I-20 on Sewell

Road, from a 2.5-mile-long transmission line. Data/fiber utility distribution will be provided by a dual-redundant campus ring.

2.1.2 Project Schedule

From the start of Project master planning until the start of saleable production, the construction period of Phase 1 is expected to be approximately 36 months, as outlined in Table 1. General construction of building foundations during Phase 1 is estimated to commence in the first half of 2026. Substantial completion of the core manufacturing buildings is planned for late 2026 and early 2027, with a target date for receiving the Phase 1 certificate of occupancy of spring 2027. Equipment installation is planned to begin in fall 2027; this will be phased in over time. Start-up for trial operations, debugging, and validation will occur sequentially as equipment is installed, beginning in the second half of 2027, with the facility becoming partially operational by the third quarter of 2027. Full operation of the first production capacity block is expected in 2028.

The Phase 2 construction schedule has not been developed; however, completion of Phase 2 is targeted for the end of 2030. Full development of the Project (Phase 1 and Phase 2) is described as part of the Proposed Action in Section 2. The impacts of the Project are presented in Section 3.

2.2 Operation

Operation of the facility will be organized according to the three main subassemblies, referred to as vehicle body, drive unit, and battery assembly, which feed into the general assembly process (see Exhibit 1, Manufacturing Process).

Table 1. Project Schedule – Phase 1

Activity	Estimated Start	Estimated Length of Activity
Rivian breaks ground	Q2 2026	—
On- and off-pad utilities construction	Q2 2026	18 months
Shop foundation construction	Q2 2026	12 months
CUP foundation construction	Q2 2026	3 months
CUP structural steel	Q3 2026	5 months
Shop structural steel	Q3 2026	22 months
First shop ready	Q3 2026	—
Rail access construction	Q1 2027	14 months
Last shop ready	Q2 2027	—
Manufacturing validation	Q4 2027	10 months
Start of saleable production	Q4 2028	—

2.2.1 Manufacturing Operations

2.2.1.1 Vehicle Body

The vehicle body shop is where the structure of the vehicle is assembled. Starting in the stamping shop, steel and aluminum sheets are stamped to form exterior and interior structural panels of the vehicles using large die presses. The stamped panels, along with components from suppliers, are then transferred to the body shop where automated robotic cells join the

vehicle panels together into the vehicle body. Joining methods include welding, riveting, bolting, and adhesive bonding. Battery pack frames and enclosure components are also assembled in the body shop. Assembled parts are scanned and measured to verify fit, alignment, strength, and quality during this phase of the manufacturing process. Process wastewater is generated in the stamping and body shops from washing the stamping dies and other parts to remove oil and debris.

After components are assembled in the body shop, they are routed to the paint shop. Vehicle bodies, doors, and other panels undergo an automated surface pre-treatment step, followed by automated electrodeposition coating dip for corrosion resistance. Other parts, like battery frames, doors, and enclosures, are also undergo an automated electrodeposition coating dip for corrosion resistance. Vehicle bodies then receive an automated spray application of primer and color coating. Between coatings, vehicles and parts are processed in convection ovens to cure and dry. Process wastewater is generated in the paint shop from metal surface pre-treatment and maintenance of the electrodeposition coating dip tanks. After completing the paint processes, the vehicle body is sent to general assembly.

2.2.1.2 Drive Unit

In drive-unit assembly, three drive-unit subassemblies are built and integrated into a completed drive unit. The drive unit converts power from the battery into the energy needed to move the EV. The inverter converts direct current (DC) from the vehicle battery pack to alternating current (AC), which can then be used by the drive unit and other vehicle systems. The rotor and stator make up the electromagnetic system that moves the EV.²

² The rotor is the moving component of the electromagnetic system that powers EVs. The stator is the stationary component of a rotary system and creates the magnetic field. Copper windings in the stator, along with the power from the battery, create the electric field that causes the magnetized rotor to move. The motion of the rotor creates torque on the rotor's axis, which is transferred to the intermediate gears and differential of the vehicle.

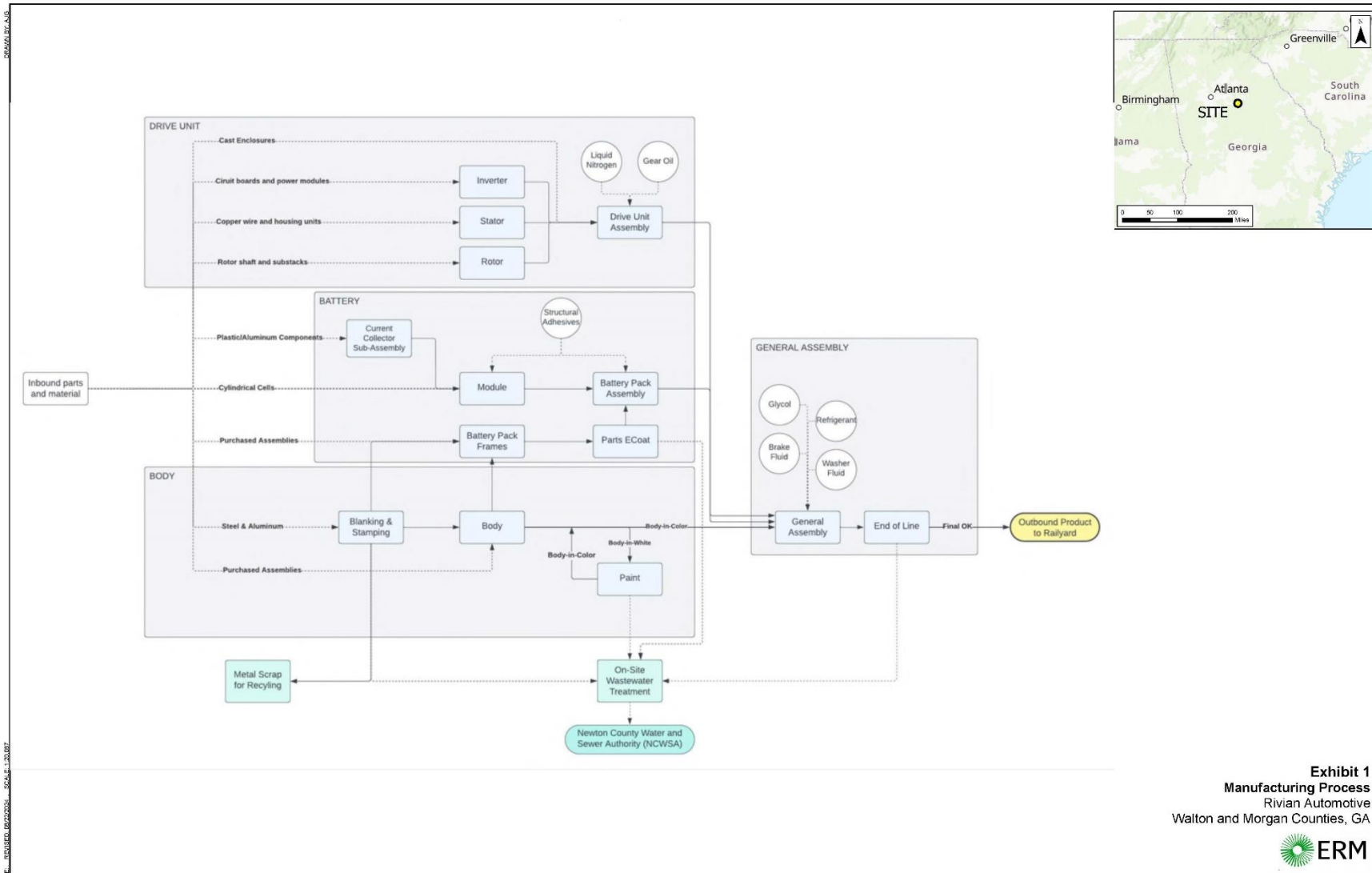


Exhibit 1. Manufacturing Process

The inverter, rotor, and stator are assembled with a combination of robotic equipment and manual assembly operations. An inverter is built by assembling electrical components, installing coolant lines, and testing. A rotor is built by assembling a rotor shaft and magnetized rotor stacks. Liquid nitrogen is applied to the rotor shaft to thermally shrink fit it to the heated rotor stack. Gear oil is supplied to the oil pump for the gearbox, which transfers motion from the rotor to the wheels and allows variation in speed. A stator is built by winding copper wire to form a mat and assembling it with the other electrical components. The inverter, rotor, and stator, along with an acoustic casing, mounts, a coolant system, electric harnesses, and other components, are then integrated into a completed drive unit, which is then routed to general assembly to become part of a completed Rivian vehicle.

2.2.1.3 Battery Assembly

In battery assembly, automated robotic equipment is used in combination with manual assembly operations to build battery modules and battery packs. The EV batteries start as cylindrical lithium-ion cells. Each individual lithium-ion cell is inspected and tested prior to assembly. Battery cells are joined to cooling plates for thermal performance management. Groups of battery cells are connected in the battery module using a current collector assembly. The battery module receives a layer of insulating adhesive for thermal protection, structural integrity, and fire prevention. Battery modules are combined in the battery frame, then several high- and low-voltage connections are made throughout the assembly process to create a completed battery pack. The thermal management and cooling systems are connected throughout the pack and tested to ensure good connections. Other electronics are also integrated into the battery pack enclosure prior to final testing and delivery to general assembly for integration into the completed vehicle.

2.2.1.4 General Assembly

In general assembly, parts from each shop are integrated into the final vehicle as it moves along the various assembly lines. Additional interior and exterior components of the vehicle, including electrical harnesses, instrument panels, HVAC systems, glass, seats, doors, tires, and various trim pieces, are also installed in general assembly. Vehicles move along an automated conveyor where components are installed manually or with power-assist equipment. The first fill of vehicle fluids like coolant, brake fluid, windshield washer fluid, HVAC refrigerant, and hydraulic fluid also takes place in the general assembly line. After general assembly, the vehicle goes through end-of-line inspection for various quality checks and additional vehicle care. Quality checks include wheel alignment, headlight alignment, dynamic vehicle testing, sensor calibration, and leak testing. Process wastewater is generated in at the leak test station. After end-of-line inspections and quality checks, the vehicle receives final OK and is ready for delivery.

2.2.1.5 Water Use

The facility will be served by the Newton County Water and Sewerage Authority (NCWSA) as part of the EDA, as detailed in Appendix C. Rivian will use a combination of potable and reclaimed water to support manufacturing operations. Table 2 outlines NCWSA's water resources and Rivian's demand upon full buildout of the Project. Potable water will be used for drinking water as well as facility needs; reclaimed water will be used only for process water, fire water, and other industrial uses. Process water to be used for painting operations will undergo further treatment on-site at the paint shop to achieve purity standards. High-purity water treatment will involve reverse osmosis, pH balancing, and activated carbon filtration. Rivian will

extend existing lines for potable water, reclaimed water, and sewer flows along the I-20 Frontage Road to on-site use points.

Table 2. Potable and Reclaimed Water Supply and Project Demand

	Average NCWSA Supply (Maximum NCWSA Supply)	Average Rivian Demand (Maximum Rivian Demand)
Potable Water	2.0 million gallons per day (mgd) (2.0 mgd)	1.66 mgd (3.88 mgd)
Reclaimed Water	2.1 mgd (3.1 mgd)	2.42 mgd (3.44 mgd)

Rivian will not use surface water or groundwater resources to supplement its operations.

2.2.2 Staffing and Operational Timeframe

To support projected production levels, Rivian plans to have three work shifts per day, 5 days per week, 24 hours per day; Phase 1 will reach full capacity in late 2029. The estimated total number of employees per day is 7,500, with approximately 2,000 operational heads per shift. The anticipated staffing plan for Phase 1 is provided in Table 3.

Table 3. Anticipated Site Setting (Phase 1)

Year	2027				2028				2029			
Quarter	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Percentage of employees			4%	8%	11%	18%	28%	42%	55%	69%	84%	100%
Estimated number of employees			305	585	819	1,329	2,077	3,159	4,161	5,162	6,331	7,500

At maximum Phase 1 operation/production, approximately 2,000 employee vehicles and 100 additional delivery/supply trucks are estimated to be on-site during peak daytime shifts. Phase 2 staffing is still under evaluation by Rivian; potential impacts will be evaluated when additional information is available.

2.2.3 Shipping and Receiving

Raw materials for the Project will be sorted and buffered in off-site warehousing, then trucked to the site and received in the process area where they will be used. The selection of off-site warehousing is under way and will include leasing 1.2 to 1.9 million square feet of space within a 30-mile radius of the Project. Leasing and tenant improvements to warehousing space are not subject to the proposed LPO for federal financial assistance.

Incoming raw materials will require approximately 1,830 weekly truck trips in Phase 1, with AM and PM shift peaks at 54 trucks per hour in Phase 1; that number will increase to 108 trucks per hour in Phase 2. Materials needed for body, paint, and general assembly will enter through the East Gate from a proposed Frontage Road to Old Mill Road. Materials for battery assembly and the drive unit will enter through the South Gate from a proposed Frontage Road along I-20.

Outgoing product shipping will rely upon railway as well as truck shipments, with up to three outbound rail shipments per day. The remainder of product deliveries will require approximately

18 truck shipments per day (126 per week) in Phase 1 and approximately 36 per day (252 per week) in Phase 2. Materials will be moved and transported around the facility to various production areas using trucks, forklifts, and electric carts. Table 4 summarizes the expected quantities of materials moved at the facility per year.

Table 4. Inbound and Outbound Materials

Materials	Transport Method	Quantity per Year	Unit of Measurement
Phase 1			
Inbound fluids	Truck	6.7	Million gallons
Inbound parts and materials	Truck	87,000 (482,200)	Truck loads (tons)
Outbound products	Rail and truck	200,000	Vehicles
Outbound wastes	Truck	23,100	Tons
Outbound recyclables	Truck	136,250	Tons
Phase 2			
Inbound fluids	Truck	13.5	Million gallons
Inbound parts and materials	Truck	17,400 (964,000)	Truck loads (tons)
Outbound products	Rail and truck	400,000	Vehicles
Outbound wastes and recyclables	Truck	46,200	Tons
Outbound recyclables	Truck	272,500	Tons

Note that a separate entrance for inbound and outbound material delivery has been incorporated into the overall transportation engineering design to help reduce and/or mitigate the impacts that routine logistical delivery vehicles may have on traffic patterns for employees, visitors, and guests.

2.2.4 Material and Waste Management

2.2.4.1 Industrial Wastewater Management

Industrial process wastewater from stamping, body, and paint (up to 0.18 million gallon per day [mgd]) will be treated at an on-site WWTP. Constituents of concern from these processes include oil and grease, detergents, solvents, hydrocarbons, metals, phosphates, dust, and debris. Treatment at the on-site WWTP will include coagulation, flocculation, clarification, pH adjustment, and filtration. Metal sludge will be dewatered prior to disposal. The treated water will be discharged to Newton County's new A. Scott Emmons Water Reclamation Facility (ASE WRF). The design and operation of the on-site WWTP will meet the local and categorical municipal receiving water requirements of the NCWSA, allowing NCWSA to operate within its existing National Pollutant Discharge Elimination System permit limits. The on-site WWTP will have a design capacity of 0.35 mgd in Phase 1 and 1.45 mgd in Phase 2. Sanitary wastewater, cooling tower water, and water from end-of-line leak testing (approximately 0.09 mgd) will not be treated on-site but instead discharged directly to the sanitary sewer and received by the ASE WRF.

Actual discharges to the ASE WRF after on-site treatment from the Project are anticipated to decrease as system efficiencies are factored into designs. Anticipated maximum operational wastewater discharges are provided in Table 5. The total amount of wastewater discharged from the Project (0.653 mgd) is below the daily wastewater limit authorized for discharge by the NCWSA (1.6 mgd).

Table 5. Estimated Wastewater Discharge from Manufacturing Operations

Wastewater Source	Estimated Phase 1 Discharge (gallons/day)	Estimated Phase 2 Discharge (gallons/day)
Lavatories	16,000	29,000
Eating/drinking	13,000	24,000
Process water	177,650	510,300
Cooling towers	45,000	90,000
Total	251,650	653,300

2.2.4.2 Hazardous Materials

Various hazardous materials are used in manufacturing processes. Adhesives and sealants are used in the battery pack assembly process. The paint process involves surface pre-treatment, an electrodeposition coating (“E-coat”), primers, base coats, and sealant applications to the vehicle body and components. The wastewater plant uses chemicals for pH balancing and metal removal. A chemical treatment is applied to the incoming water supply to meet the purity needs of the manufacturing processes. The glycol, brake fluid, gear oil, washer fluid, and gaseous refrigerants in the stationary storage tanks are piped to general assembly for the first fill of vehicle fluids. The stationary tanks will be located on secondary containment pads and designed with engineering controls for spill control and prevention. In addition, various inert gases are used for body welding processes and utility purposes; these will be stored in outdoor tank farms and portable cylinders throughout the facility. Table 6, below, describes the stationary storage tanks associated with the Project. The tanks will be designed for specific substances. Safety measures (e.g., spill and leak detection systems), as well as applicable and appropriate secondary containment structures, will be incorporated into the overall design. In preparation for operation of the Stanton Springs site, policies and procedures regarding health and safety, hazardous materials management, and waste management will be developed specific to the site, along with reporting and notification requirements. For example, Section 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA) will be provided to local and State agencies for emergency planning and response purposes.

2.2.4.3 Solid and Liquid Waste Management

During operations, the facility will generate both solid and liquid hazardous and non-hazardous waste during manufacturing processes. General non-hazardous solid waste is associated with routine building operations and maintenance. All waste generated at the facility will be collected, categorized, and properly disposed of and/or recycled at off-site disposal facilities in accordance with all applicable federal, State, and local environmental regulations using Rivian-approved and properly licensed transportation and disposal contractors. Rivian will operate the facility as a 90-day storage facility for hazardous waste management purposes.

Rivian will evaluate the facility’s waste generation classification prior to start of operations and obtain an U.S. Environmental Protection Agency (EPA) ID number under the appropriate hazardous waste generator status designation. Based on the status determination, additional plans and procedures may be developed in compliance with Resource Conservation and Recovery Act regulations, which may include requirements for a hazardous waste contingency plan and spill response plans.

Table 6. Project Stationary Storage Tanks upon Completion of Phase 2

Chemical Name	Physical State	Largest Tank Size (gallons)	Number of Stationary Tanks
Glycol	Liquid	40,000	1
Brake fluid	Liquid	5,000	1
Washer fluid	Liquid	20,000	1
Refrigerant	Liquid	20,000	1
Gear oil	Liquid	20,000	1
Argon	Gas	13,000	1
Carbon dioxide (CO ₂)	Gas	13,000	1
Liquid nitrogen	Liquid	13,000	1
Battery sealant and adhesive	Liquid	10,000	3
E-Coat resin	Liquid	64,000	4
Poly-aluminum carbide (PAC)	Liquid	8,000	1
Ferric sulfate Fe ₂ (SO ₄) ₃	Liquid	5,000	1
Hydrochloric acid (HCl)	Liquid	1,100	2
Sodium hydroxide (NaOH)	Liquid	1,100	2
Sodium bisulfite (NaHSO ₄)	Liquid	1,100	2
NALCO antiscalant	Liquid	1,100	2
Biocide	Liquid	1,100	2

Table 7 outlines the waste streams that the Project is expected to generate. These will be properly disposed of off-site at properly licensed waste disposal facilities.

Table 7. Projected Waste Generation and Disposal

Waste Type by Anticipated Disposal Method	Disposal Method (Off-Site)	Estimated Annual Volume Phase 1 (U.S. Tons)	Estimated Annual Volume Phase 2 (U.S. Tons)
Generic and miscellaneous non-hazardous recycling ^a	Recycle	59,530	119,060
Batteries, bulbs, and electronics	Recycle/reuse	11,450	22,900
Scrap metal	Recycle/reuse	65,270	130,540
Non-hazardous solids	Energy recovery (waste to energy)	50	100
Generic trash and miscellaneous non-hazardous landfilled waste ^b	Landfill	22,020	44,040
Inorganic and corrosive hazardous waste	Chemical/physical treatment (neutralization and solidification for landfill)	15	30
Incinerated hazardous waste ^c	Incinerator	35	70
Hazardous flammable liquids	Reclamation	335	670
Hazardous waste from blended fuel ^d	Fuel blending	640	1,280
Hazardous inorganic solids	Landfill ^e	5	10

^a. Includes generic mixed recycling, cardboard, empty containers, recyclable plastics, used tires, airbags, absorbent recycling, glass and components, wood, and other miscellaneous non-hazardous liquid wastes.

^b. Includes general domestic waste (trash), non-hazardous liquids, non-hazardous solids, non-hazardous paint waste, and other miscellaneous non-hazardous waste.

^c. Includes flammable liquids, non-halogenated solvents, oxidizers, or high-hazard solids.

^d. Includes flammable liquids, flammable solvents, non-halogenated solvents, paint waste, and solvent-contaminated rags.

^e. More than 95 percent of hazardous waste is diverted from landfills at similar Rivian facilities.

3. ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

In each of the following sections, a specific resource area is addressed with both qualitative and, where applicable, quantitative information to concisely describe the nature and characteristics of the resource that may be affected by the Project as well as the potential direct and indirect impacts on that resource from the Project given project controls. A conclusion regarding the significance of impacts is provided for each resource area.

Section 3.10 provides a review of the present and reasonably foreseeable federal and nonfederal actions that may contribute to a cumulative impact when added to the impacts of the Proposed Action. The impacts of past actions were reviewed in a separate EA and therefore are not included in the evaluations provided below regarding the potential impacts of the Project.

3.2 Cultural Resources

In 2022, cultural resource surveys were completed for portions of the Project site. These identified cultural resources on and near the Project site, including Davis Cemetery (potentially eligible for listing in the National Register of Historic Places [NRHP]), three possible pre-contact rock piles grouped within a 15-meter radius of one another (unknown eligibility), and the site of a razed historic house from the late nineteenth to early twentieth century.

In September 2022, as part of its review for Permit No. SAS-2020-00182, USACE considered the potential effects of the Project on cultural resources and executed a Programmatic Agreement (PA) in accordance with Section 106 of the National Historic Preservation Act (NHPA). The PA was executed among USACE, the Advisory Council on Historic Preservation, the Georgia State Historic Preservation Officer (SHPO), GDOT, GDEcD, and the JDA of Jasper County, Morgan County, Newton County, and Walton County, regarding development of the Project site (see Appendix C). The PA addresses the identification and evaluation of historic properties as well as subsequent treatment of historic properties. It also addresses unanticipated discoveries and monitoring and reporting requirements.

LPO reviewed the PA and found the DOE undertaking to be commensurate with the scope of the undertaking covered by the PA. Furthermore, the area of potential effects for the DOE undertaking is fully encompassed by the area of potential effects evaluated in the PA. In accordance with Stipulation XI of the PA, DOE has concurred with the terms of the PA and notified the Georgia SHPO, USACE, and Advisory Council on Historic Preservation of its concurrence.

In accordance with the PA, Rivian would implement landscape and vegetative screening to address the visual/viewshed impacts associated with the Project on Davis Cemetery; in accordance with the PA, Rivian has completed a cemetery survey and the required documentation. Although site development would not disturb the pre-contact rock piles, Rivian would mark a 100-foot archeological site buffer around the rock piles to ensure no disturbance during construction of the Project.

Given the lack of impacts on potential archaeological resources, execution of the PA to address both adverse impacts and potential adverse effects on historic properties, the measures that have been and would be implemented by Rivian pursuant to the PA, and the controls that are in place to address an unanticipated discovery of cultural resources, impacts on cultural resources as a result of the Project would not be significant.

3.2.1 Native American Interests

On August 31, 2023, DOE sent letters to six federally recognized tribes (Alabama-Quassarte Tribal Town, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Muscogee [Creek] Nation, The Lower Muskogee Creek Tribe) to notify the tribes of the federal undertaking (i.e., consideration of federal financial support for the Project). DOE also asked if the tribes had an interest in the federal undertaking or if the tribes had any information regarding nearby cultural resources (see Appendix A). Following submission of the letter, LPO contacted each tribe; to date, no additional information has been received.

USACE consulted with the six tribes listed above as well as an additional eight tribes during development of the PA (see Appendix A). To date, none of the tribes requested signatory or concurring party status in the PA. Because no traditional cultural properties have been identified and no tribes have expressed interest in the Project site, with the controls that are in place, significant impacts on cultural resources, including Native American interests, as a result of the Project are not anticipated.

3.3 Water Resources

3.3.1 Operational Water Usage

Water would be used in various manufacturing processes and by the facility's work force. NCWSA would supply both potable and reclaimed water to the facility. At the start of the Project, water demand would be met by NCWSA. Upon Project completion, on-site water storage tanks would be used to balance peak and average demand for potable and reclaimed water, ensuring that Rivian demand would not exceed NCWSA supplies. The existing reclaimed water supply would be supplemented with NCWSA's development of a new reverse-osmosis treatment facility, resulting in additional capacity amounting to 5.5 mgd (*Rockdale Citizen and Newton Citizen* 2023).

As presented in Section 2, sanitary wastewater from the Project would be discharged directly to the ASE WRF; all industrial process wastewater, including cooling tower discharges, would be treated at the on-site WWTP prior to discharge to the ASE WRF. No industrial or sanitary wastewater would be discharged to surface waters. The on-site WWTP would have a design capacity of approximately 1.45 mgd; the anticipated daily discharge from the on-site WWTP would be approximately 0.653 mgd. Water would be treated to meet NCWSA maximum allowable industrial headworks loadings for the ASE WRF, in accordance with all applicable federal, State, and local pre-treatment standards.

Given the wastewater treatment process at the on-site WWTP, which would be designed to meet the intake water quality standards of the ASE WRF; on-site water storage to meet potable and reclaimed water demands; design capacity of the planned on-site WWTP, which would exceed the capacity necessary for anticipated industrial discharge flows; and the Project's total wastewater discharge volume, which would be well below the ASE WRF's capacity of 1.6 mgd, no significant impacts are expected from operational water usage or wastewater generation, treatment, and discharge.

3.4 Air Quality

Pursuant to the Clean Air Act (CAA), EPA established National Ambient Air Quality Standards (NAAQS) to control a limited number of widely occurring criteria pollutants, including carbon monoxide (CO), nitrogen dioxide, ozone, particulate matter with a diameter of less than 2.5

micrometers (PM_{2.5}), particulate matter with a diameter of less than 10 micrometers (PM₁₀), and sulfur dioxide (SO₂). Primary air quality standards were developed for these pollutants to protect public health, including sensitive populations such as children, elderly, and asthmatics; secondary standards were developed to protect the nation's welfare, providing protection against decreased visibility and damage to animals, crops, and vegetation. EPA has concluded that the current NAAQS protect the public health, including the at-risk populations of older adults, children, and people with asthma, with an adequate margin of safety. The airshed that contains the Project site in Morgan and Walton Counties is in attainment for the NAAQS, meaning that none of the ambient concentrations of criteria pollutants exceed air quality standards.

Air emissions from construction of the Project would be generated from mobile sources (e.g., trucks, automobiles), including dust from earthmoving activities. Emissions from workers' vehicles, construction equipment, and trucks would be temporary and transient in nature. Various best management practices (BMPs) (e.g., wetting agents [water] on active earthmoving and site grading operations) would be implemented throughout the Project's construction phase. In addition, trucks would be washed and their open beds would be covered to limit particulate emissions and nuisance dust.

Portable air monitoring equipment would be used for dust monitoring during days with earthmoving and site grading operations. Dust monitoring would be performed in accordance with EPA Community Air Monitoring Program (CAMP) guidelines (U.S. Environmental Protection Agency n.d.a.). In accordance with CAMP guidelines, dust levels would be maintained at or below 150 micro per cubic meter (ug/m³) at the Project site perimeter during earthmoving and site grading activities. Table 8, below, provides a summary of the dust concentration thresholds as well as the resultant actions that Rivian would take to mitigate and reduce dust emissions to acceptable levels during construction activities.

Table 8. Summary of CAMP Monitoring Action Levels

Parameter	Concentration Threshold	Action Required
Particulates (particulate matter, PM ₁₀ , PM _{2.5})	< 150 µg/m ³ at downwind perimeter location(s)	Normal construction/earthmoving activities continue
	150 µg/m ³ average sustained for more than 15 minutes at downwind perimeter location(s)	Collect upwind perimeter location readings for comparison against downwind perimeter locations
	> 100 µg/m ³ above upwind background or visible dust migrating from the disturbance area beyond downwind perimeter location(s)	Employ dust suppression techniques
	Dust suppression techniques unable to control downwind levels to < 100 µg/m ³ compared to upwind concentration	Construction earthmoving activities halted and corrective actions taken until dust levels return to acceptable concentrations

During operation, the Project would be a source of regulated air pollutants, including CO, nitrogen oxides (NO_x), PM₁₀, PM_{2.5}, SO₂, volatile organic compounds (VOCs), GHG in the form of carbon dioxide equivalents (CO₂e), and hazardous air pollutants (HAPs). The facility-wide potential-to-emit levels associated with operation of Phase 1 and Phase 2 of the Project are summarized in Table 9. Both Morgan and Walton Counties are currently in attainment or designated as unclassified areas with respect to the NAAQS for all criteria pollutants.

Table 9. Project Potential to Emit

Pollutants	Phase 1 Tons per Year (tpy)	Phase 2 Tons per Year (tpy)
Particulate matter	133.80	267.6 ^a
PM ₁₀	133.23	266.46 ^a
PM _{2.5}	133.19	266.38 ^a
SO ₂	0.98	0.98
CO	80.93	80.93
NO _x	51.95	51.95
VOC	191.62	383.24 ^b
Lead	4.74E-04	4.74E-4
CO ₂ e	114,087	114,087
Total HAP	19.18	38.36

^a. Rivian would have a permit condition that would require it to cap filterable particulate-matter emissions and ensure annual emissions do not exceed 250 tpy.

^b. Rivian would have a permit condition that would require it to cap VOC emissions and ensure annual emissions do not exceed 250 tpy.

Because of emission levels, the Project is considered a major source with respect to the CAA's Title V permitting program and an area source with respect to HAP emissions. In September 2023, Rivian submitted an application for a state implementation plan (SIP) construction permit to the Georgia Environmental Protection Division (EPD) for its review and approval. The Georgia EPD has deemed the SIP construction permit application complete and issued the Air Quality Permit No. 3711-297-0061-E-01-0 on August 20, 2024. After discussions with Georgia EPD, Rivian would apply for air permits for Phase 1 and 2 separately. In accordance with the issued Phase 1 air permit, various control technologies and capping techniques have been incorporated into the Project design and would be implemented during Project operations, including:

- Installation and operation of a regenerative thermal oxidizer (RTO), with approximately 95 percent destruction/removal efficiency for VOC control
- Use of high-efficiency, fine-dispersion paint guns coupled with dry particulate filters on paint shop equipment capable of greater than approximately 80 percent removal efficiency for PM₁₀ and PM_{2.5} emissions
- Use of electric equipment when technically feasible to minimize use of combustion equipment. If used, boilers and other combustion equipment would be designed with low-NO_x burners to control combustion emissions
- Installation and operation of VOC concentrator equipment with approximately 85.5 percent capture efficiency rating

Georgia EPD also regulates emissions of toxic air pollutants (TAPs) through a program approved under the provisions of State Rule 391-3-1-.02(2)(a)3(ii). A TAP is defined as any substance that may have an adverse effect on public health, excluding any specific substance covered by a state or federal ambient air quality standard. After a comparison of the 45 TAPs that would be emitted by the Project against the respective minimum emission rates for each, 22 pollutants (1,3-butadiene, benzene, formaldehyde, naphthalene, arsenic, cadmium, chromium VI, cobalt, lead, mercury, xylene, acetaldehyde, acrolein, hexamethylene diisocyanate, toluene diisocyanate, kaolin, carbon black, barium sulfate, titanium dioxide, limestone, calcium oxide, antimony trioxide) required further modeling and analysis, according to the Georgia EPD Guideline for Ambient Impact Assessment of TAPs (Guideline) (Georgia

Environmental Protection Division n.d.). Data from the Atlanta-Hartsfield Jackson International Airport meteorological monitoring station, generated from the EPA and American Meteorological Society air dispersion model (AERMOD [v22112]), were used to model emissions from the 22 TAPs associated with proposed operations. These were modeled as point sources, which were linked to the 10 stacks at the facility and the respective processes that would generate emissions of each pollutant (U.S. Environmental Protection Agency n.d.b.).

Because modeling software relies on specific stack locations and parameters, only the known stack locations for Phase 1 emissions were modeled. Model-predicted results for the 22 pollutants are below their respective acceptable ambient concentration (AAC), as established by Georgia EPD, indicating that further refinement/analysis is not necessary. The TAP impact is determined to be insignificant, according to the Guideline.

Regarding permitting in Phase 2, because modeling is conducted on an as-needed basis, Phase 2 modeling would be conducted once Phase 2 air permitting is under way. Should any TAP show an exceedance of the AAC for Phase 2, Rivian would take measures to ensure that the exceedances are resolved appropriately through the addition of controls or permit limits. Georgia EPD cannot approve a permit application or issue a permit for projects that shows violations of the CAA or State air quality programs. Therefore, the initial assumptions on Phase 2 emissions and modeling results are likely to change and undergo further refinement as Phase 2 development and planning continues.

For Georgia EPD to issue a construction and/or Title V air permit, the permit must comply with the CAA. Rivian would be required to operate in compliance with the issued construction or operational permits and the CAA. Rivian would prepare and submit a Title V operating permit application to Georgia EPD within 12 months of the commencement of operations associated with the Project. Rivian would cap emissions through additional process controls and the use of alternative materials; therefore, the site would qualify as conditional non-major source, or synthetic minor source, with respect to the significant deterioration applicability thresholds by limiting potential emissions of criteria air pollutants³ to less than 250 tons per year each. Emission calculations conservatively assume a required capture efficiency; however, it is anticipated that the capture efficiency would be higher. Because Rivian would cap emissions, the Project would not be subject to New Source Review for prevention of significant deterioration pollutants, in accordance with 40 CFR Part 52.21(b).

Given the location of the Project and existing air quality conditions; compliance with air permit requirements; modeling results, which are well below the AAC thresholds; and the use of control equipment and emission caps to reduce and limit emissions, impacts on air quality as a result of the Project would not be significant.

3.5 Noise

3.5.1 *Applicable Standards and Existing Conditions*

The Project boundaries are within Walton County, Morgan County, and the City of Social Circle. Walton County has a nuisance-type noise ordinance that restricts unreasonably loud sounds but does not specify decibel performance standards (Walton County 2014). Construction noise is exempt from the ordinance provided it occurs between the hours of 6:30 a.m. and 7:00 p.m. Monday through Friday or between 7:00 a.m. and 7:00 p.m. on Saturday. The ordinance also exempts “normal and legal operations of industrial uses within a property designated land use

³ The criteria air pollutants, as defined by EPA, are PM, ground-level ozone, CO, SO₂, nitrogen dioxide, and lead.

district of the Walton County Land Development Code and Walton County Comprehensive Plan.” Similar to Walton County, Morgan County has a nuisance-type noise ordinance that restricts unreasonably loud sounds but with no decibel performance standards (Morgan County 2021).

The City of Social Circle Code of Ordinances, Chapter 9, Article IV, restricts unreasonably loud sounds. However, it does not contain any restrictions pertaining to construction or operational noise that would be applicable to the Project (City of Social Circle 2023).

EPA recommends that environmental noise levels should not exceed a day-night sound level (L_{dn})⁴ of 55 A-weighted decibels (dBA). EPA considers this level to be protective of the public health and welfare (USEPA, 1974).

The Project is located in the Stanton Springs Business Park zoning district and surrounded by industrial development, with neighboring properties home to a trucking company, railroad, various light industrial businesses, agricultural land, and approximately 60 residences. Noise-sensitive areas (NSAs) were identified after a review of aerial photographs taken near the Project site. The NSAs are developed with light-density residential properties west, north, and east of the site. Provided in Table 10, below, is a summary of the discrete nearby NSAs and their distance and direction from the approximate center of the Project site. No residences are located within 0.5 mile of the center of the Project site.

Table 10. Identified Noise-Sensitive Areas

NSA	Land Use Type	Approximate Distance/Direction from Center of Project Site
1 – Highway 12 West	Residential	3,600 feet/west
2 – Highway 12 Northeast	Residential	3,800 feet/northeast
3 – Davis Academy Road	Residential	6,700 feet/east
4 – Old Mill Road	Residential	6,500 feet/southeast
5 – Hancock Drive	Residential	5,100 feet/southwest

Because the Project site is State owned, it is exempt from local zoning ordinances; however, as noted in Section 2, Rivian would adhere to the regulations applicable to the Stanton Springs Business Park zoning district, an area where objectionable heavy industrial noise is not permitted. No numerical noise limits that would be applicable to the Project were identified in the zoning code for the Stanton Springs Business Park or the local or county noise ordinances of Walton County, Newton County, Morgan County, or the City of Social Circle.

3.5.2 Noise Analysis

Table 11 can be used to assess construction-related noise levels at NSAs. Reference noise data for each phase of construction were utilized to calculate construction related noise levels at the NSAs (BBN,1971). It provides the highest modeled noise levels at specific distances from the nearest approach; however, actual noise levels experienced at the NSAs would vary, depending on the area where construction is occurring.

The actual noise levels that would be experienced at NSAs would be a function of distance. No one NSA would be exposed to the same sound levels as construction progresses through the site. Lower sound levels would occur when equipment is operated farther away from NSAs. The predicted noise levels listed in Table 11, below, were calculated by considering the reduction in

⁴ The day-night noise level is the A-weighted L_{eq} sound level over a 24-hour period, with an additional 10-decibel (dB) penalty imposed on sounds that occur between 10 p.m. and 7 a.m. to account for increased sensitivity to noise during that period.

noise that occurs with distance (e.g., a 6 dBA reduction with a doubling of distance) and the effects of sound absorption by air. The noise levels do not account for vegetation or intervening structures, which would serve as effective noise barriers and reduce off-site noise levels. Furthermore, the equipment used is generally not operated continuously, nor is the equipment operated simultaneously.

Table 11. Calculated Average Construction Noise Levels with the Minimum and Maximum Amount of Equipment in Operation

NSA	Approximate Distance from Nearest Approach	Foundations (dBA)	Building Construction (dBA)	Restoration/Finishing (dBA)
1 – Highway 12 West	3,000 feet	35–35	30–42	32–47
2 – Highway 12 Northeast	1,125 feet	47–47	42–54	44–59
3 – Davis Academy Road	3,800 feet	32–32	27–39	29–44
4 – Old Mill Road	3,600 feet	32–32	27–39	29–44
5 – Hancock Drive	700 feet	52–52	47–59	49–64

The measures that would be adopted during construction to minimize noise levels include the following:

- Properly maintaining all diesel-powered equipment and ensuring that functional mufflers are installed
- Reducing vehicle speeds for equipment on-site
- Turning off equipment that is not in use
- Ensuring that stationary pieces of equipment, such as generators, are not placed in proximity to noise-sensitive receptors

Operational Project noise sources include the multiple cooling tower cells, main step-down transformers, roof vents, rooftop HVAC units, and the stamping facility. Roof vents would be located on most buildings, with the majority of vents located on the paint shop building. Locations for Project sources and NSAs can be found in Figure 5. Modeling was conducted with all Project sources in full operation, as presented in Table 12. The barrier and noise-reflection effects of the Project buildings were factored into the model; however, no reductions from off-site vegetation or foliage were factored into the model. Discrete model receptors were placed at the location of the aforementioned NSA locations so that direct comparison to the estimated ambient conditions and EPA guidelines could be made.

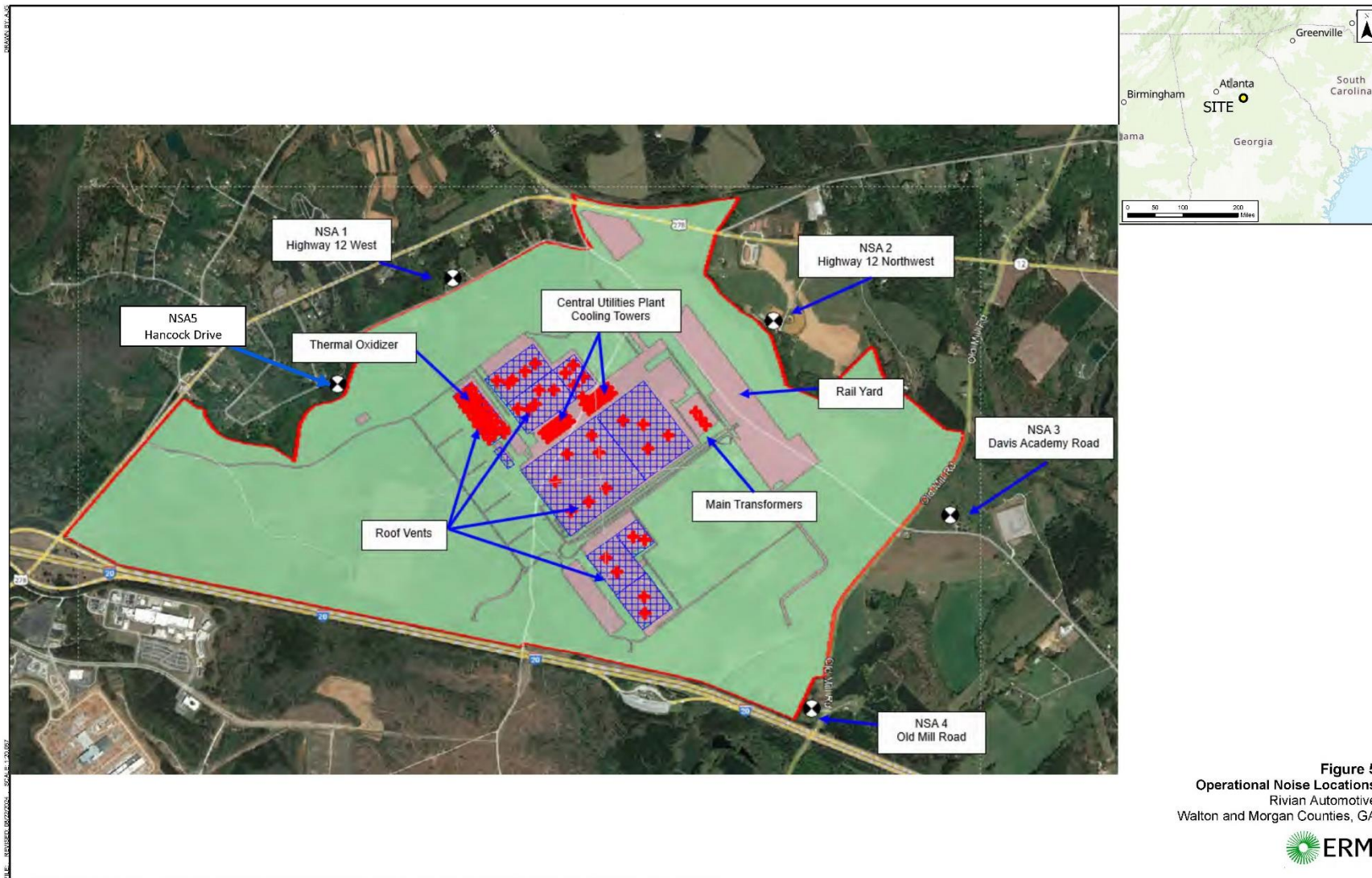


Figure 5. Operational Noise Locations

Table 12. Noise Model Results

NSA	Modeled Noise Level (dBA) ^a	EPA-Recommended Protective Guideline (dBA) ^b	Estimated Daytime Ambient (dBA) ^c	Estimated Nighttime Ambient (dBA) ^c
1 – Highway 12 West	42	48.6	50	44
2 – Highway 12 Northeast	45	48.6	50	44
3 – Davis Academy Road	34	48.6	50	44
4 – Old Mill Road	34	48.6	50	44
5 – Hancock Drive	39	48.6	50	44

a.: CadnaA computer model developed by DataKustik, GmbH (2006)

b. USEPA, 1974

c. ANSI, 2013

As provided in Table 12, operational noise levels at the NSA locations range from 34 to 45 dBA. Modeled noise levels are below the estimated existing daytime ambient noise levels and at or below the nighttime levels. Project-generated noise levels are also below EPA's recommended protective noise level.

Given the calculated construction noise levels presented in Table 11 and the continuous operational noise levels presented in Table 12, all of which are at or below the EPA protective guidelines and in most cases below ambient noise levels, no significant noise impacts are anticipated from construction or operation of the Project.

3.5.2.1 Intermittent Sources – Rail Yard Noise

The Project would include a rail yard for product shipments on the northern end of the property. Noise generated at the rail yard would include steady noise from diesel locomotives moving through the yard as well as noise from train car coupling. Noise emissions data for these two activities were obtained from literature (Urman 1987), which indicates a noise level of 80 dBA at 100 feet for a diesel locomotive moving through the yard and up to 91 dBA at 100 feet for train car coupling. The noise emissions data were input to the CadnaA model but modeled separately from the balance of facility noise emissions because they represent intermittent noise. The analysis was conducted for the NSA location nearest to the rail yard (Highway 12 Northeast). A summary of the modeled rail yard noise levels is provided in Table 13.

Table 13. Modeled Rail Yard Noise

NSA	Locomotive Movement (dBA)	Car Coupling (dBA)
2 – Highway 12 Northeast	50	62

Rail yard activity would result in intermittent sounds at the nearby NSAs. Train arrivals/ departures are anticipated to occur two times per day or less. The model's predicted locomotive noise level of 50 dBA is in the range of the estimated existing daytime noise level at the nearest NSA. Lower noise levels would be experienced at the remaining NSA locations. Train car coupling noise would be an impulse-type sound of up to 62 dBA at the nearest NSA, lasting less than 1 second per car. To the extent practicable, railcar coupling/uncoupling would take place during daylight hours to limit off-site nighttime noise impacts.

There would be no new rail crossings, and no new areas would be exposed to train noise that are not already exposed. The Project is expected to introduce no more than three new train trips per day. The impact related to noise would not be significant.

3.6 Transportation

The Project site is bordered by I-20, U.S. 278, and Old Mill Road. U.S. 278 is an east–west, two-lane undivided roadway that has been classified as a “minor arterial” by GDOT. Old Mill Road is a north–south, two-lane undivided local roadway. A 2.8-mile-long Frontage Road was constructed by GDOT to connect U.S. 278 to Old Mill Road just north of I-20 and across from the Project site (Jacobs 2023). GDOT completed a study of trip distribution and traffic generated with complete Project buildout. This was used to estimate AM and PM peak-hour entering and exiting volumes. The March 2022 GDOT *Interchange Justification Report, I-20 at Old Mill Road Interchange (PI 0018361)*, Morgan County, and the June 2022 GDOT *Existing-Year Traffic Data and Future-Year Volumes Memo (PI 0017219, PI 0018363, PI 0018361)* accounted for future traffic demand from the Project and surrounding planned developments (see Appendix C for the GDOT memorandum).

3.6.1 Off-Site LOS

Level of service (LOS) refers to the traffic-carrying ability of a roadway, as indicated by service levels ranging from LOS A to LOS F. LOS A represents unrestricted maneuverability and operating speeds. LOS F represents breakdown conditions, characterized by stop-and-go traffic.

Under existing conditions, I-20 and U.S. 278 operate at LOS A or LOS B in the AM and PM hours. Intersections in the Project area at U.S. 278, I-20, and Old Mill Road, as well as other locations, currently experience LOS A or LOS B in the AM and PM hours, except for the intersection at U.S. 278 and State Route 11, which sees an AM peak-hour LOS of C and PM peak-hour LOS of D.

As stated above, in addition to the Project, the GDOT memorandum accounted for future traffic demand due to planned development in Stanton Springs. Traffic forecasting considered the population growth rate and future-year development, including the Project; the Stanton Springs development to the south across I-20; and the Stanton Grove development to the west across U.S. 278.

As a result of planned development and increased roadway demand, GDOT determined that the following improvements would be necessary:

- Widening of U.S. 278 from Shire Parkway to Willow Springs Church Road (PI 0017219)
- Construction of a Frontage Road on the north side of I-20 from U.S. 278 to Old Mill Road (PI 0018363)
- Widening of Old Mill Road and construction of a new interchange at I-20 and Old Mill Road (PI 0018361)

These projects would be completed by GDOT prior to opening of the Stanton Springs North site in 2025 (Jacobs 2023).

3.6.2 Project Trip Generation

Trip generation calculations for the Project used employee data, shift times, the worker mix, and equations from the Institute of Transportation Engineers *Trip Generation Handbook*, 10th edition.

Trip generation calculations for Stanton Springs and Stanton Grove relied on industry mix and development size, also from the *Trip Generation Handbook*. Projected trips for the Project, Stanton Springs, and Stanton Grove were added to background traffic volumes, after accounting for annual growth, to generate design volumes for the 2045 design year.

Table 14 provides trip generation estimates for travel to and from the Project site. Considered were projected headcounts, shift change times, and projected truck traffic. AM and PM peak hours reflect the peak shift times with the greatest number of arrivals and departures. Traffic at the Project site is projected to be greater than the background traffic on the roadways during these times. Trip distribution is based on travel patterns, using traffic volumes documented in the June 2022 memorandum to GDOT. Most trips are anticipated to access the site from I-20.

Table 14. Project Trip Generation Estimates

Trip Type	AM and PM Peak Hour (Shift Peak)	
	Entering	Exiting
Phase 1		
Passenger Cars	2,000	2,000
Trucks	100	100
Total	2,100	2,100

In addition to the planned roadway improvements, CSX is constructing a rail spur north of U.S. 278 that would extend to the Project site. A bridge would also be constructed, allowing U.S. 278 to pass over the rail spur; therefore, there would be no need for an additional rail crossing.

3.6.3 Transportation Impacts from Construction

Vehicle access to the site for employees and deliveries would be from the main access road on U.S. 278, which would transition to the recently completed Frontage Road ~~that would be constructed~~ during Phase 1 of the Project. Construction workers would work one 12-hour shift, with arrivals and dismissals occurring at 5:30 a.m. and 6:30 p.m., respectively. The shifts would include some weekend work. The proposed outbound lot on the north side of the Project site and the proposed employee parking area on the south side of the Project site would be used as the parking area for construction vehicles. Construction employment is estimated at 2,000 contractors per day, which is less than employment at full operation. It is expected that the upgrades being completed by GDOT would minimize construction traffic impacts.

Because of the robust nature of the current road infrastructure and planned improvements to Frontage Road, the impacts on transportation resulting from construction of the Project would not be significant.

3.6.4 Transportation Impacts during Operations

According to the traffic study (Jacobs 2023), intersections on the external (public) roadway network, including intersections where GDOT improvements are projected to be completed before the completion of Phase 1, would experience acceptable intersection operations with minor improvements, such as restriping the lanes or channelizing right turns into the Project site in accordance with National Cooperative Highway Research Program criteria. Once the Project is operational, employees would use the main access road; truck traffic would use Frontage Road to access the site and alleviate traffic impacts. GDOT would be responsible for the

roadway improvements that would be occurring during both phases of the Project. During Phase 1, the following improvements are planned:

- Channelizing the northbound right-turn lane from U.S. 278 to the main access road
- Restriping the main access road for one left-turn lane and one left-/right-turn lane
- Restriping of Frontage Road for one left-turn lane and one left-/right-turn lane
- Signalizing Frontage Road and secondary access road
- Providing a southbound left-turn lane for exiting the Project site from the secondary access road to Frontage Road
- Channelizing the westbound right-turn lane from Frontage Road to the secondary access road
- Signalizing Frontage Road and South Gate access road

The infrastructure improvements that would occur during Phase 2 include the following:

- Providing an additional northbound right-turn lane from U.S. 278 to the main access road
- Providing an additional westbound left-turn lane from the main access road to U.S. 278
- Widening U.S. 278 to accommodate additional southbound through lanes
- Providing an additional southbound left-turn lane from the secondary access road to Frontage Road
- Providing a southbound left-turn lane from the South Gate access road to Frontage Road
- Channelizing the right-turn lane from Frontage Road to the South Gate access road
- Channelizing the right-turn lane from Frontage Road to Old Mill Road
- Restriping the southbound East Gate access road to create a dedicated right-turn lane, a through lane, and a dedicated left-turn lane

These infrastructure improvements would be designed and built to accommodate the increase in traffic volumes.

3.6.5 On-Site LOS from Operation (Phases 1 and 2)

The intersections that would be used to access site and their overall average intersection delay are outlined in Table 15. Operations at the intersections range from LOS A to LOS D. Only one intersection with access to the site (access point #2) is projected to experience LOS D, which would occur only for westbound egress. Two other intersections (access points #1 and #5) would experience LOS C westbound egress and ingress, respectively. The remaining intersections would experience LOS A or LOS B during both ingress and egress. Figure 6 from the traffic study (Jacobs 2023) shows the access points for the Project site.

Table 15. Project Build Average Intersection Level of Service (Ingress/Egress)

#	Intersection	Phase 1 Overall	Phase 2 Overall
1	U.S. 278 and Main Access Road	A/C	A/C
2	U.S. 278 and Frontage Road	A/B	A/C
3	Frontage Road and Secondary Access Road	A/B	A/B
4	Frontage Road and South Gate Access Road	A/B	A/B
5	Frontage Road and East Gate Access Road/Old Mill Road	B/A	C/B

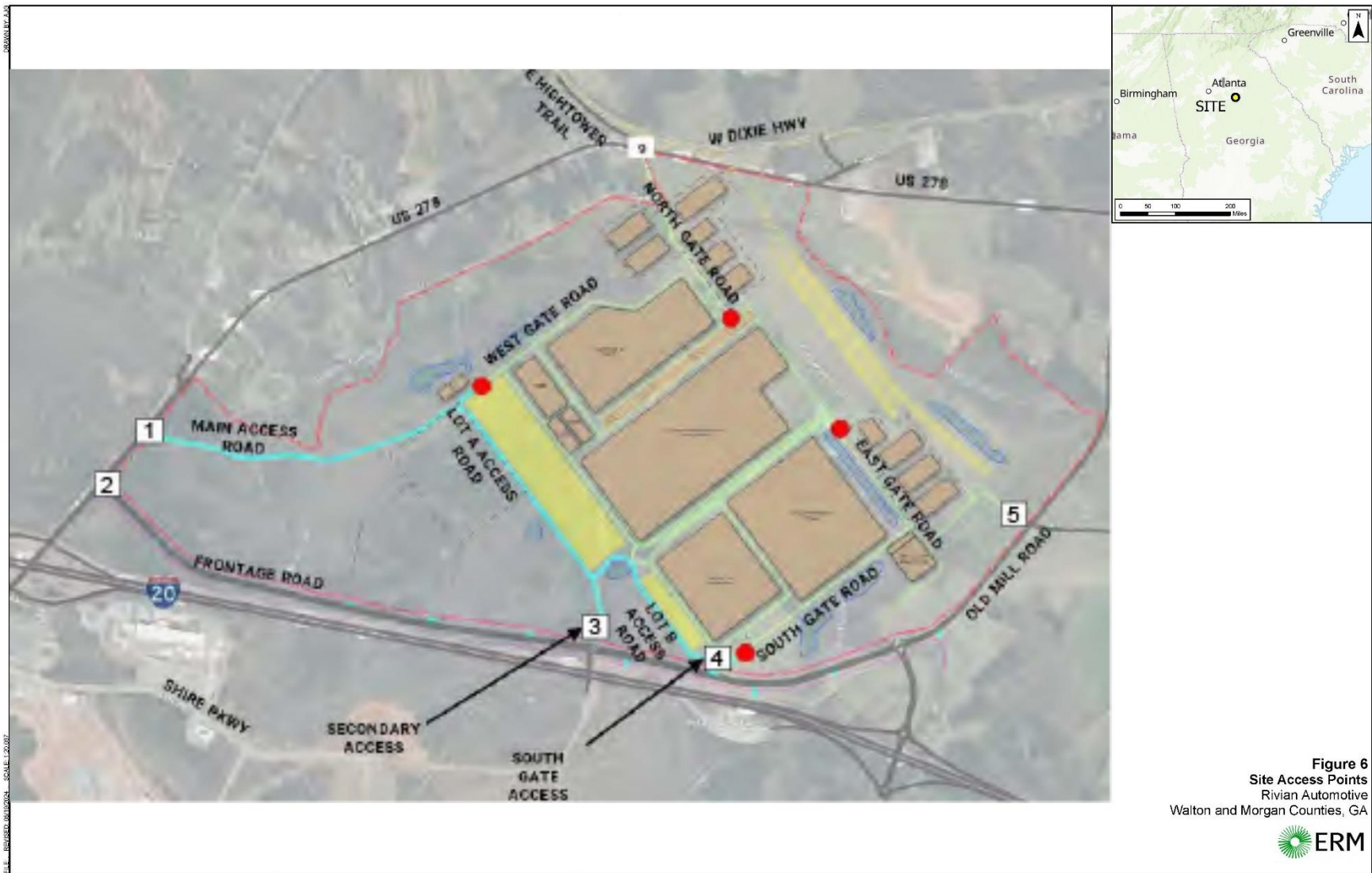


Figure 6. Site Access Points

To limit local traffic impacts once the Project achieves full buildout of Phase 2, Rivian would implement shift offsetting techniques to reduce the effects of shift changes on adjacent roadway networks.

At full production, Rivian estimates that up to 164 railcars would be used to ship materials off-site, which equates to no more than three train trips per day. The Rivian railcar shipments would be separated at various points along the CSX rail line, depending on their destination. The CSX rail line currently sees five to 14 trains per weekday on the Georgia Railroad mainline. The additional train traffic from the Project site would not alter current rail operations, and because the rail spur from the existing CSX rail line would pass under U.S. 278, there would be no impact on highway traffic.

Given the current road infrastructure and planned infrastructure expansions, which would improve traffic conditions for all users; the timing and scheduling of employee shifts; and the internal site egress/access and traffic design measures, impacts on transportation resulting from operation of the Project would not be significant.

3.7 Socioeconomics and Environmental Justice

3.7.1 Socioeconomics

The Project site is in the Stanton Springs Business Park special zoning district and adjacent to a combination of zoned agricultural areas and agricultural uses to the east, a community mixed use to the south and west, and scattered residences to the northwest. The Project site is near the City of Social Circle, straddling both Morgan and Walton Counties and adjacent to Newton County, Georgia.

Development and operation of the Project would increase employment opportunities, tax revenue, and direct and indirect spending in the local economy. The increase in local employment may increase the demand for and use of local community resources and infrastructure. Both Morgan and Walton Counties issued new comprehensive county development plans in 2022 (Mosaic Consulting et al. 2016; Northeast Georgia Regional Commission 2022), and Newton County issued a comprehensive development plan in 2023 (Georgia Department of Community Affairs 2023). The development plans for both Walton and Morgan Counties accounted for continued growth and associated services in the region, and the Newton County plan identified and accounted for population growth (i.e., approximately 3,900 new residents) associated specifically with development of the Project. The Newton County plan addresses the increase in traffic specific to the Project and outlines general goals in support of continued growth and development, including:

- Promote a balanced mix of land uses
- Attract high-paying employers and employment options to the county that would benefit county residents
- Retain and support existing businesses
- Increase workforce development efforts to prepare and connect people to jobs
- Ensure the county's infrastructure and utilities are sufficient and able to meet the needs of current and future residents

Ongoing county-level planning and coordination between Rivian and the surrounding counties would continue to address the population growth attributable to the Project as well as other development projects in the area.

For Phase 1, Rivian projects that the facility would provide approximately 7,500 full-time jobs, which would support approximately 8,000 new indirect jobs (GDEcD 2022 and 2023a). Rivian estimates that the average annual salary would be approximately \$56,000, which would be slightly less than local median household income in the four-county region (\$71,692 in Walton County, \$64,767 in Newton County, \$71,000 in Morgan County, and \$57,424 in Jasper County [U.S. Census Bureau 2020]) but exceed the local median income for non-family households (\$39,715 in Walton County, \$46,296 in Newton County, \$35,597 in Morgan County, and \$31,026 in Jasper County [U.S. Census Bureau 2020]). Collectively, the Project is expected to generate more than \$1 billion in labor income annually (Georgia Power 2021). Revenue from taxes and payments in lieu of taxes (PILOT) would amount to an estimated \$900 million over the next 25 years, using conservative estimates. These funds would go to the four surrounding counties as well as the City of Social Circle to support government functions, including police and fire services, roads, parks, and other public services, with 60 percent of the net total tax revenue directed to the school districts within the Project area (GDEcD 2023b).

Prior to the announcement of Rivian's Stanton Springs North facility, the four-county region was not considered a housing-burdened area. Since the announcement, residential developers have added to the supply of housing (e.g., the 11-building, 388-unit Sinclair at Callaway Farm). This new development has contributed to the median home price in the four-county area remaining at approximately \$320,000.

Rivian has engaged in conversations with local officials to explore rezoning options for city-controlled, non-entitled sites to meet the future demand for housing in the region, housing that would be available to future Rivian employees. GDEcD, the governor's office, and district representatives have expressed their support for the Project and would continue to help Rivian and the communities in the region find creative ways to address the needs of the housing market as they arise.

The Project is expected to attract a portion of the approximately 70,000 Jasper, Morgan, Newton, and Walton County residents who commute outside the four-county region each day for work (U.S. Census Bureau 2020). Those 70,000 potential candidate employees not only account for approximately 70 percent of the four-county workforce but also, presumably, would not need new housing stock, given they already reside within the four-county region. Starting wages offered by Rivian would be 30 to 60 percent higher than the wages offered to the more than 28,500 people in the commutable area who work in retail or material movement. Currently, approximately 75 percent of the four-county workforce commutes for 45 to 60 minutes. Rivian's clean-energy jobs, attractive pay, benefits, equity, and shorter commutes are anticipated to attract this existing workforce. Tax revenue as a result of the Project would support government functions and offset any increase in demand for community resources from the influx of additional workers and their families. Rivian also intends to create an advisory council, which would include representatives from a cross-section of local communities. This council would help Rivian build relationships with local communities, provide a platform for Rivian to share updates regarding construction of the plant and ongoing operations, identify opportunities for meaningful engagement with local communities, and help identify and address community concerns.

As a result of increased tax and PILOT revenue to the local community, the increased availability of attractive clean-energy jobs, the partnerships for housing development, and the availability of housing, impacts on socioeconomics as a result of the Project would not be significant.

3.7.2 Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs federal agencies to address environmental and human health conditions in minority and low-income communities (*Federal Register* 1994). The National-Scale Air Toxics Assessment (NATA) cancer risk and respiratory hazard index, as defined in EPA's EJScreen, an environmental justice (EJ) screening and mapping tool, was used as the baseline for the analysis of impacts. The evaluation of EJ is dependent on determining if high and adverse impacts from the Project would disproportionately affect minority or low-income populations in the affected community.

In accordance with EPA's EJ guidelines, minority populations should be identified when either 1) the minority population of the affected area exceeds 50 percent or 2) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In this case, the recommended percentage set by EPA would be 10 percent above the reference baseline population.

Populations of the Census Block Groups (CBGs) within a 5-mile buffer area surrounding the Project site boundary were reviewed using EPA's EJScreen (U.S. Environmental Protection Agency 2024). The analysis used the state of Georgia as the reference population for consistency. As a result, each CBG was compared to the same baseline information. The ethnic and racial composition of the block groups and counties within this buffer area, as well as the state, is presented in Table 16. Low-income populations and populations of color make up less than 50 percent of the population within the 5-mile buffer area; however, one county and two block groups have percentages for low-income populations and/or populations of color that are meaningfully greater than those of the state of Georgia. The notable block groups and counties are highlighted in Table 16 and shown in Figure 7.

Table 16. Population, Ethnicity, and Income

Analysis Area	Total Population	Population of Color	Low Income
Georgia	10,722,325	49%	33%
Morgan County	20,171	27%	20%
Census Tract 102.00 Block Group 1	1,247	47%	44%
Census Tract 102.00 Block Group 2	1,053	15%	13%
Census Tract 102.00 Block Group 3	1,542	11%	26%
Census Tract 105.00 Block Group 1	2,053	27%	19%
Newton County	113,298	58%	32%
Census Tract 1002.02 Block Group 1	2,035	19%	16%
Census Tract 1002.02 Block Group 2	2,335	4%	8%
Census Tract 1002.02 Block Group 3	1,922	40%	13%
Census Tract 1002.04 Block Group 2	1,289	28%	14%
Walton County	97,752	29%	29%
Census Tract 1108.01 Block Group 1	1,546	30%	25%
Census Tract 1108.01 Block Group 2	1,450	15%	31%
Census Tract 1108.01 Block Group 3	903	1%	13%
Census Tract 1108.02 Block Group 1	2,183	52%	33%
Census Tract 1108.02 Block Group 2	2,000	6%	30%

^a. U.S. Environmental Protection Agency, 2024

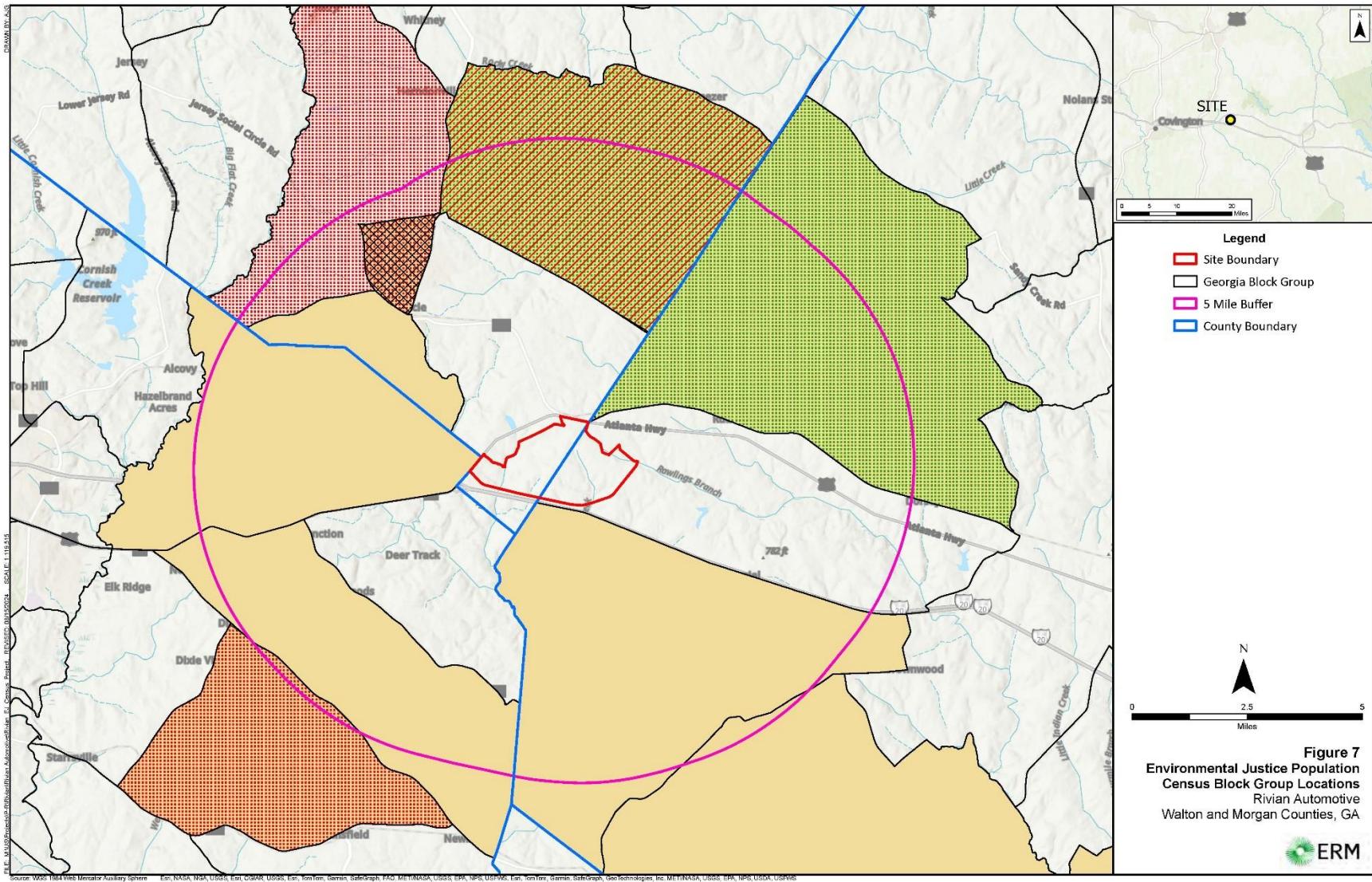


Figure 7. Environmental Justice Population Census Block Group Locations

Although race and income are the primary measurements for an EJ assessment, EJScreen also includes secondary indicators, which may indicate additional stressors on a community. Unemployment rates, a population with limited English proficiency, the level of educational attainment, and vulnerable age groups can be considered with primary indicators and can be helpful in determining the needs of a community by providing insights regarding engagement. In this report, for these secondary indicators, block groups with values greater than those of the state of Georgia are marked as a potential stressors, as presented in Table 17 and Figure 8.

Table 17. Secondary Socioeconomic Indicators

Analysis Area	Unemployment (percent)	Limited English Proficiency (percent)	Less than a High School Education (percent)	Under Age 5 (percent)	Over Age 64 (percent)
Georgia	6	3	12	6	16
Morgan County	3	0	11	5	20
Census Tract 102.00, Block Group 1	4	0	29	4	21
Census Tract 102.00, Block Group 2	0	0	6	2	28
Census Tract 102.00, Block Group 3	3	3	11	5	16
Census Tract 105.00, Block Group 1	4	3	11	3	21
Newton County	7	1	10	6	13
Census Tract 1002.02, Block Group 1	5	0	7	3	19
Census Tract 1002.02, Block Group 2	3	0	11	5	13
Census Tract 1002.02, Block Group 3	1	0	6	6	28
Census Tract 1002.04, Block Group 2	5	0	5	10	20
Walton County	5	1	13	6	16
Census Tract 1108.01, Block Group 1	0	0	0	1	19
Census Tract 1108.01, Block Group 2	26	0	11	11	22
Census Tract 1108.01, Block Group 3	0	0	11	8	9
Census Tract 1108.02, Block Group 1	2	0	15	1	13
Census Tract 1108.02, Block Group 2	0	5	44	4	44

^a U.S. Environmental Protection Agency, 2024

In most of the study area, the unemployment rate is less than the average for the state of Georgia (6 percent). However, the overall unemployment rate in Census Tract 1108.01, Block Group 2, in Walton County is 26 percent. Newton County's overall unemployment rate is just slightly higher than the state average (7 percent). Only one block group has a percentage of the population with limited English proficiency (5 percent) that is larger than the percentage for the state (3 percent); although, at 5 percent, given the margin of error and a population of 2,000, only about 100 people are included in this population. The percentage of residents with less than a high school education in one county and two block groups is above the state percentage. The study area has a population that leans older, with nine CBGs having larger percentages of those over 64 compared with the state of Georgia.

In addition to the demographic and socioeconomic information in EPA's EJScreen, the tool also has pollution and source data for 13 environmental factors that can affect a community. That information is combined with socioeconomic data to create EJ indexes, using the formula $EJ\ Index = (Environmental\ Indicator\ Percentile\ for\ Block\ Group) \times (Demographic\ Index\ for\ Block\ Group)$.

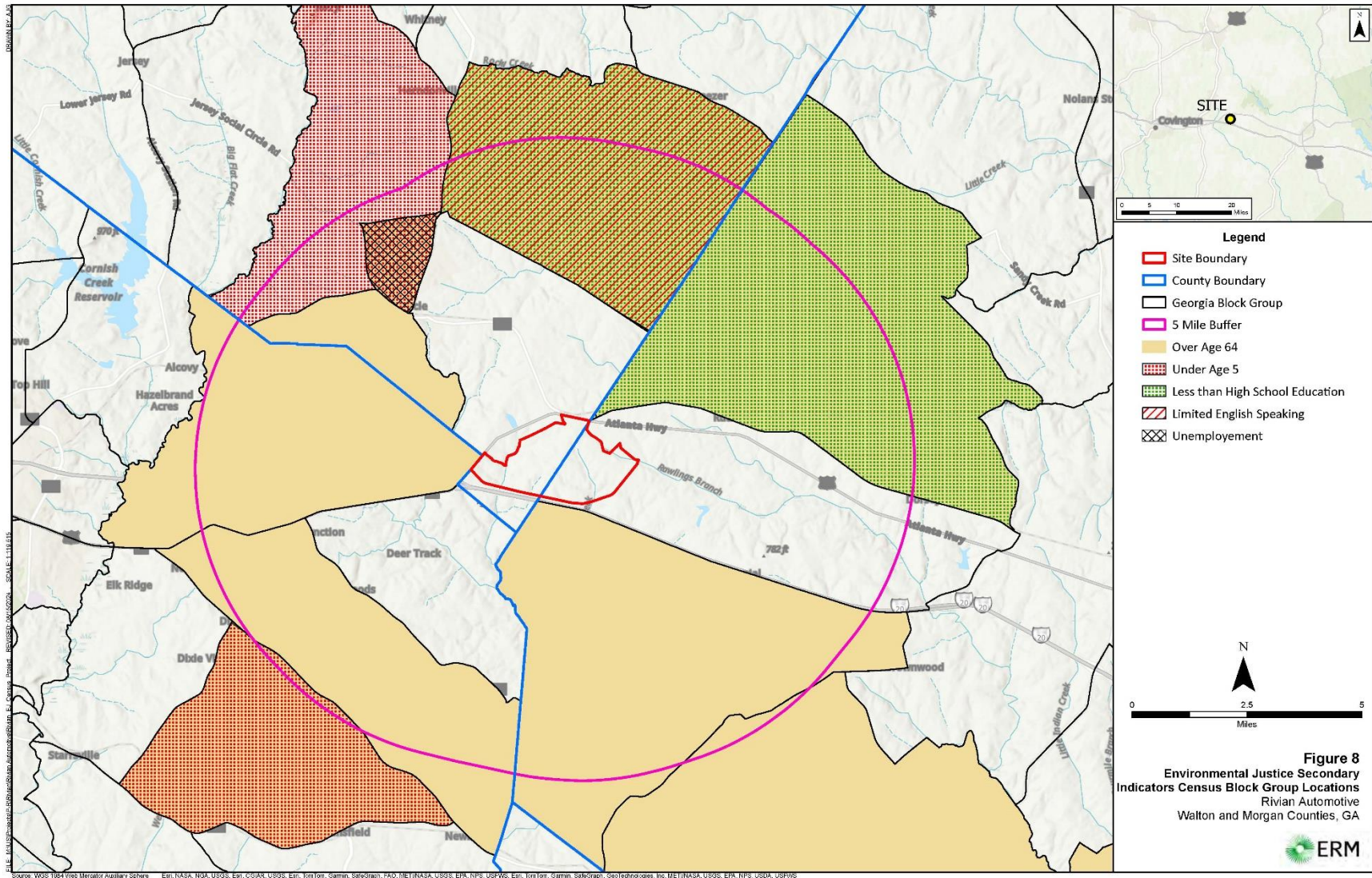


Figure 8. Environmental Justice Secondary Indicators Census Block Group Locations

EPA suggests that EJ Index rankings above the 80th percentile indicate the potential for cumulative impacts on a community. Specifically, EPA guidelines suggest that an EJ Index with a threshold at the 80th percentile can identify communities that may be experiencing a disproportionate burden.

Percentiles are a way to see how an area of analysis compares to every other area in a region, state, or the entire United States (U.S. Environmental Protection Agency 2016). *Percentile* is a relative term. It is used to determine a ranking in comparison to others. As shown in Table 18, two EJ indexes in the study group have values at the 80th percentile and above: toxic releases to air and drinking water non-compliance. These EJ indexes appear in eight of the 13 CBGs, with all eight CBGs meeting the threshold for drinking water non-compliance and two CBGs also meeting the threshold for toxic releases to air. These notable block groups are shown in Table 18 and Figure 9.

Table 18. EPA EJScreen Indicators for Project Area

EJ Indexes	Morgan County				Newton County				Walton County				
	CT 102.00 BG 1	CT 102.00 BG 2	CT 102.00 BG 3	CT 105.00 BG 1	CT 1002.02 BG 1	CT 1002.02 BG 2	CT 1002.02 BG 3	CT 1002.04 BG 2	CT 1108.01 BG 1	CT 1108.01 BG 2	CT 1108.01 BG 3	CT 1108.02 BG 1	CT 1108.02 BG 2
PM _{2.5}	77	40	51	53	48	23	29	52	63	61	29	76	53
Ozone	56	22	31	30	31	12	41	36	42	40	15	54	32
Nitrogen dioxide	6	4	13	5	13	3	19	15	15	24	3	27	5
Diesel particulate matter	47	23	40	26	40	13	39	32	44	40	16	55	31
Toxic releases to air	89	51	64	68	60	28	72	64	75	72	35	86	63
Traffic proximity	25	11	17	15	24	6	25	18	21	10	9	23	15
Lead paint	63	29	29	45	19	15	39	37	39	55	0	54	27
Superfund proximity	0	0	0	0	0	0	0	0	0	0	0	0	0
RMP facility proximity	0	0	0	0	45	30	49	42	50	0	32	0	36
Hazardous waste proximity	44	22	26	22	32	18	38	37	57	56	23	64	32
Underground storage tanks	61	32	41	42	40	29	51	45	56	63	30	65	41
Wastewater discharge	48	19	26	30	23	11	29	23	40	35	13	60	26
Drinking water non-compliance	92	0	81	81	0	0	0	80	83	82	74	89	80

RMP = Risk Management Program

^a. U.S. Environmental Protection Agency, 2024

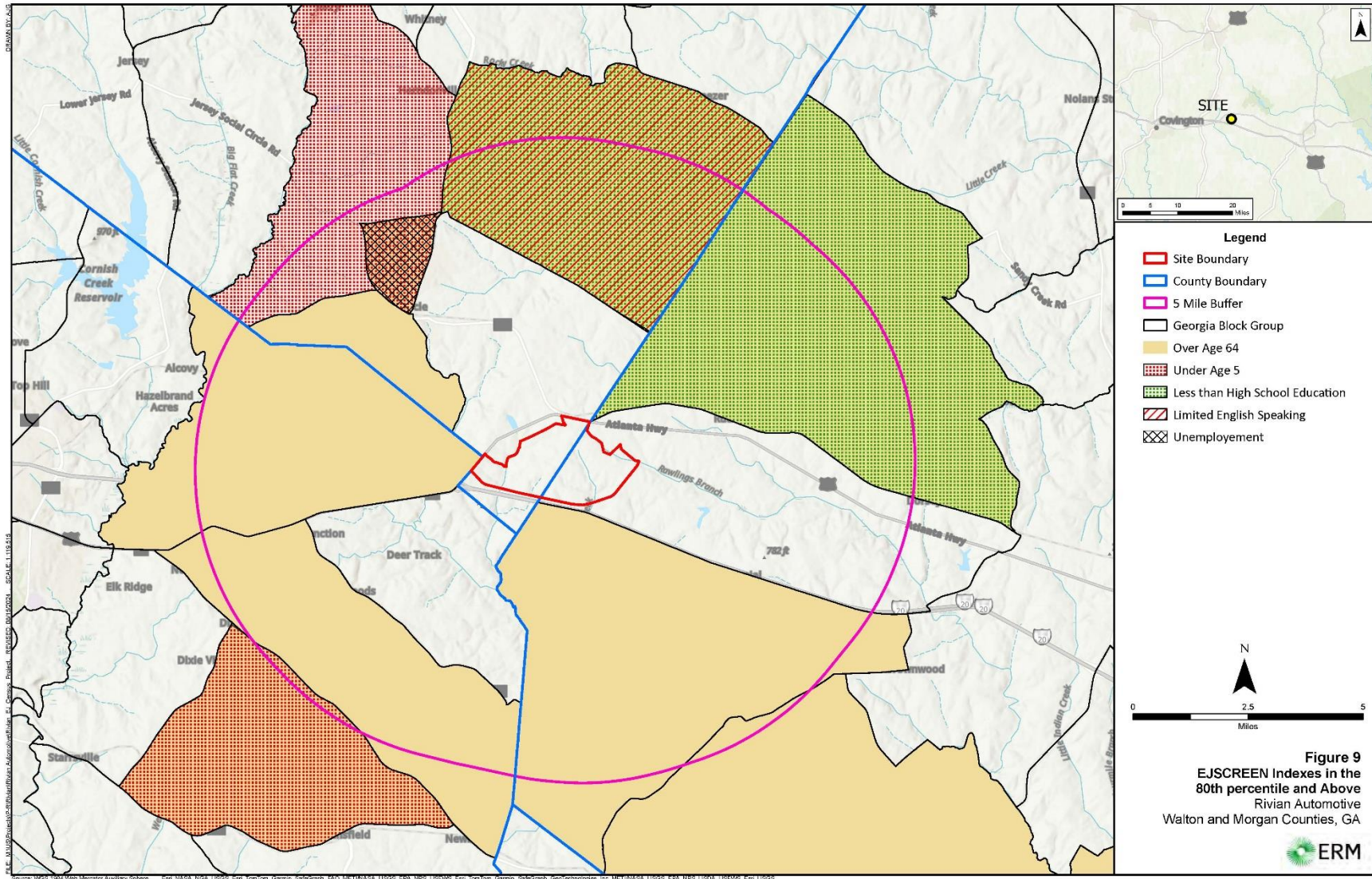


Figure 9. EJSCREEN Indexes in the 80th Percentile and Above

Emissions from the Project are being reviewed by the Georgia EPD for the Project's Title V major-source air emissions permit, as discussed in Section 3.4, Air Quality. Modeled emissions were well below the AAC for toxic air contaminants; therefore, the emission levels of criteria pollutants and HAPs associated with the Project are considered to be protective of human health and the environment. Compliance with emission limits and caps would be achieved by monitoring control equipment, including a VOC concentrator, RTO, baghouse, and carbon adsorption systems. The air permit application discussed in Section 3.4 underwent a 30-day public advisory period that ended on November 10, 2023 (Georgia Environmental Connections Online 2024).⁵ Georgia EPD issued the final air quality permit on August 20, 2024.

Rivian has already started partnering with local trade schools, colleges, and universities to develop and recruit the skilled workforce needed to support this Project; this includes supporting all levels of career progression and education. For example, Rivian is already partnering with the Technical College System of Georgia in the Project area to launch industrial-maintenance and tool-and-die apprenticeship programs. Rivian's University Relations group is actively engaging local colleges and universities like the University of Georgia, Georgia Tech, Kennesaw University, Morehouse College, Clark Atlanta University, Spelman College, and Georgia State University, Newton County campus. Rivian has also hosted a Rivian Adventure Camp for elementary schools within the four-county region to support student interest in STEM education and careers. It has also hosted events with campus chapters of Women in Mechanical Engineering, the Society of Hispanic Professional Engineers, and Society of Women Engineers, offering recruiting information sessions, networking nights, and engineering panels. In fall 2023, Rivian hosted an event at the Georgia Tech Student Competition Center and sponsored and participated in the Georgia regional conference of the National Society of Black Engineers.

Transportation is a critical service gap throughout the study area and, very likely, throughout the region. Rivian Public Policy as well as Commute and Mobility teams are already coordinating with Walton County and the Georgia Regional Transportation Authority to improve commuter transit options from the surrounding communities, including new stops on regional bus routes and additional carpool/vanpool services in the facility area. The Project would incorporate the infrastructure needed to allow adequate bus access on the Project site. Rivian is planning to develop services and transit agreements as more information on where workforce commuters live becomes available later in the Project.

Rivian is exploring internal shuttle service options from Atlanta workspace locations as well as Hartfield-Jackson Atlanta International Airport. As currently implemented at the facility in Normal, Illinois, Rivian would provide internal carpool matching services at the Project facility. Carpool users would be incentivized with benefits like improved parking access at the facility.

Rivian has installed approximately 17 EV chargers in Newton County and four fast-charger locations in Georgia, with eight more fast-charger locations planned for the state. Rivian has also installed Level 2 charging stations at several Georgia State Parks, including Tallulah Gorge, Fort Yargo, and Cloudland Canyon. Facility employees would also have an opportunity for free EV charging while parked at the facility. Access to charging reduces barriers to EV ownership in the community and helps reduce tailpipe air pollutant emissions (e.g., criteria pollutants, HAPs, GHGs) from traditional internal-combustion vehicles.

Rivian would be required to comply with the CAA as well as permit conditions to protect public health. Because modeled air emissions are below Georgia EPD AAC limits for toxic air

⁵ Permit processing status can be viewed here: <https://geco.gaepd.org/Permits/Application.aspx?id=29046>.

contaminants, impacts are not expected. The Project would bring added opportunities for education, providing the community with options to enter the skilled workforce and participate in clean-energy employment. As a result, the Project would not have a significant impact on EJ communities in the vicinity of the Project site.

3.8 Health and Safety

Consistent with the Rivian Environment, Health, and Safety (EHS) Management System implemented at existing Rivian facilities, the Rivian EHS Management System would be implemented during construction and operation of the Project. Rivian develops internal standards and programs that comply with federal and state regulations. Included are program administration and communication, risk assessment and hazard control, legal and compliance requirements, training, emergency preparedness and response, incident investigation, and contractor/visitor management.

During construction of the Project, the construction contractor(s) would be responsible for developing a site-specific occupational health and safety plan and emergency response plans to address hazards and safety risks associated with their work on the Project.

During operation, hazardous chemical products would be used in various production processes, primarily in pack assembly, paint, wastewater treatment, and general assembly processes. Table 19, below, describes the chemicals/materials that are expected to be used and their estimated annual usage quantities. Note that the Project is still in the design phase; the projected materials and estimated amounts may change as the design is finalized. Additional storage, handling, use, and disposal requirements for the products listed can be found in Appendix C.

Table 19. Project Annual Chemical/Materials Usage

Process	Chemical Name	Projected Annual Use	
		Phase 1	Phase 2
General assembly	Glycol (gallons)	983,000	1,965,000
General assembly	Brake fluid (gallons)	49,000	96,000
General assembly	Ethanol-based washer fluid (gallons)	264,000	528,000
General assembly	Refrigerant (pounds)	330,000	660,000
General assembly	Gear oil (gallons)	332,000	665,700
General assembly	Hydraulic fluid (gallons)	238,000	475,500
Battery	Battery sealant and adhesive (gallons)	4,750,000	9,500,00
Paint	Pre-treatment 5% hydrofluoric acid (gallons)	4,200	8,500
Paint	Vehicle coatings (gallons)	157,800	315,600
Wastewater treatment	Sulfuric acid, 93% (gallons)	20,000	40,000
Wastewater treatment	Poly-aluminum carbide (PAC) (gallons)	109,500	182,500
Wastewater treatment	Ferric sulfate $\text{Fe}_2(\text{SO}_4)_3$ (gallons)	109,500	182,500
High-purity water treatment	Hydrochloric acid (HCl) (gallons)	12,550	50,200
High-purity water treatment	Sodium hydroxide (NaOH) (gallons)	12,550	50,200
High-purity water treatment	Sodium bisulfite (NaHSO_4) (gallons)	12,550	37,650

Stored volumes of hazardous materials that exceed regulated thresholds would be in compliance with the CAA Section 112(r) Risk Management Program (RMP) as well as the

Occupational Health and Safety Administration (29 CFR Section 1910.119) Process Safety Management (PSM) guidelines for highly hazardous chemicals. Potential use of sulfuric acid for wastewater pH balancing may exceed the threshold quantity of 10,000 pounds for the RMP and 1,000 pounds for PSM. The wastewater treatment design is currently under way. Should hydrochloric acid be substituted for sulfuric acid, the Project still would not exceed PSM or RMP guidelines. Submittals and plans for these programs would be developed prior to operations but after finalization of the site layout and design. The Project would implement a plan for spill prevention and control, including countermeasures. The plan would cover topics such as oil management, chemical storage, routes for possible spills, and preventative measures. Through compliance with regulatory programs, along with implementation of proper design and management practices for chemical storage and release prevention, impacts from the storage, use, and transfer of hazardous materials are not anticipated to be significant.

Local fire departments would be informed of potential hazards associated with the facility. They would also be made aware of facility construction and layout, ensuring that first responders and the public would be protected from exposure to potentially hazardous situations in the event of a fire or industrial accident. The Project would complete its required reporting to State agencies and the Local Emergency Planning Committee, as required by the EPCRA, and coordinate closely with local fire and emergency response authorities if a chemical release or fire should occur.

Because of the commitment and measures to address health and safety, including BMPs; compliance with federal, State, and local regulations and standards; design and protection practices; plans for preventing chemical spills and the potential mishandling of hazardous materials; and Rivian's experience from the handling and use of the same hazardous materials at existing facilities, impacts on the health and safety of workers and the public from Project construction and operation would not be expected to be significant.

3.9 Waste Management

3.9.1 Construction

Waste generated during construction would be managed according to local, State, and federal regulations and in compliance with site-specific construction plans, such as construction-related occupational health and safety and emergency response plans. The construction contractor's plans would be in compliance with the Rivian Construction Contractor Management Standard, which outlines expectations and regulatory responsibilities for contractors during Rivian Projects. Hazardous waste generation is expected to be minimal during construction and below the thresholds for very small-quantity generators. Hazardous waste generated during construction is anticipated to include used oil and adhesive as well as paints with hazardous characteristics. Rivian applies a "circular economy" approach to construction whenever possible by prioritizing choices and practices regarding construction materials that minimize resource consumption as well as reusing materials, such as those that can be crushed on-site and repurposed as aggregate or infill material.

3.9.2 Operations

Rivian has an established EHS policies that would apply to the Project. These include an emphasis on setting environmental objectives to prepare for emergencies, prevent pollution, limit GHG emissions, manage and minimize waste, use resources sustainably, and protect biodiversity and ecosystems. In accordance with Rivian's established policies and procedures, as well as applicable regulatory standards and requirements, hazardous and non-hazardous waste generated during operations would be characterized, handled, and managed by Rivian in accordance with local, State, and federal regulations. Non-hazardous waste streams would

include metal for recycling, general refuse and material for recycling, and non-regulated fluids and adhesives. Disposal locations for general refuse and recycling include local Waste Management or Republic facilities in the Atlanta area. Hazardous waste streams include waste from paint, solvents, and used or expired chemical products that are listed as or characteristic of hazardous waste. Hazardous waste would be taken to transport, disposal, and storage facilities, including facilities operated by US Ecology in the southeast and across the country, depending on treatment method. Used oil would be shipped to a Universal Environmental Services facility (Peachtree, Georgia, or Knoxville, Tennessee) or Classic Oil Services (Bremen, Georgia). Metal for recycling would go to a US Ecology metals recovery facility (Atlanta, Georgia), Metro Alloys (East Point, Georgia), or CMC Recycling (Augusta, Georgia). Wastes are separated by treatment type, as outlined in Section 2.2.4. The transport of outbound waste and recyclables is discussed in Section 2.2.3, Shipping and Receiving.

Hazardous materials and waste would be stored in designated hazardous material management areas. Employees would be trained to understand Rivian policies and regulations pertaining to 29 CFR 1910.1200, the Hazard Communication Standard; the Resource Conservation and Recovery Act; and U.S. Department of Transportation standards for the management, disposal, and shipping of materials. All waste generated by the Project would be transported by properly permitted and certified waste haulers and disposed of at properly permitted off-site disposal facilities. Waste handling vendors would be subject to third-party risk management review, per standard Rivian procedure. No waste would be disposed of on the Project site. Rivian's internal waste management policies and procedures call for established, properly permitted, and approved waste management suppliers and contractors to manage and dispose of solid and liquid waste streams properly to minimize impacts on human health and the environment.

Because waste would not be disposed of on the Project site, planned waste-management practices would be in compliance with local and federal regulations, and landfill disposal would be minimized through recycling, waste minimization, and authorized solid- and liquid-waste disposal controls, impacts from waste management activities would not be expected to be significant.

3.10 Cumulative Impacts

Cumulative impacts are potential effects on the environment from the incremental impact of the Project when added to other past, present, and reasonably foreseeable future actions undertaken by other agencies (federal or nonfederal) or persons (40 CFR Part 1508.1[g]). The existing setting, as presented for the Project, takes into account past actions. The present and future actions that may contribute to a cumulative effect were identified through a review of active project lists and planning documents from the Stanton Springs JDA and Walton and Morgan Counties website. Included were ongoing projects associated with development of the Project that were not included in the USACE review. The review identified the following projects that may result in cumulative impacts:

- GDOT interchange project along I-20 (SAS-2022-00514, Morgan and Walton County, I-20 at the County Road 249/Old Mill Road interchange [PI #0018361]), an approximately 0.73-mile-long project that would address traffic capacity needs created by economic development in the area through the addition of a diamond interchange and realignment of Old Mill Road
- New Georgia Transmission Corporation electrical transmission loop, a 4-mile transmission line connecting the existing Oasis 230 kV substation and the Morning Hornet 230 kV

substation south of I-20 and Sewell Road; this second line between the Morning Hornet and Oasis substations would add reliability and redundancies to the local grid

- Stanton Springs Business Park, an approximately 1,600-acre industrial business complex for high-tech development projects, such as bio-pharmaceutical projects, along with food science companies, corporate campuses, clean manufacturing facilities, and data centers
- Takeda – Social Circle Facility, an approximately 161-acre bio-pharmaceutical manufacturing facility for plasma-derived therapies; the site includes three manufacturing buildings, multiple laboratories, warehousing, utilities, office space, and employee amenities
- Meta – Stanton Springs Data Center, an approximately 416-acre facility and part of Meta's global infrastructure of data centers for social media technologies and services
- Georgia Bioscience Training Center, an approximately 7-acre project operated by Georgia Quick Start, a division of the Technical College System of Georgia; the facility provides training and instruction on bio-manufacturing processes and other advanced manufacturing techniques.

These projects are immediately southwest of the proposed Rivian facility but within the Stanton Springs Business Park, as shown in Figure 10.

LPO reviewed the above projects to identify resources that may be subject to a cumulative impact. The review focused on the resources affected by the Rivian project and identified those that may be subject to cumulative impacts. Based on this review, the following resources were evaluated for cumulative impacts:

- Water supply and wastewater treatment
- Air quality—fugitive dust and regulated air emissions
- Transportation
- Socioeconomics and EJ

The Project, when considered together with the identified projects in the region, would not have the potential to result in significant cumulative impacts on other resources because the impacts would be of short duration (i.e., during construction) and would not overlap. The Project would not result in a significant cumulative impact.

3.10.1 Water Supply and Wastewater Treatment

As provided in Section 3.3, NCWSA would supply both potable and reclaimed water to the Project. NCWSA provides up to 25 mgd of potable water to residential and commercial customers in the region (Newton County Water and Sewerage Authority 2022). Rivian would discharge its wastewater to NCWSA, which is developing a new reverse-osmosis treatment facility that would provide an additional 5.5 mgd of reclaimed water capacity for commercial customers. To maintain a constant and available water supply, Rivian employs on-site storage tanks for potable and reclaimed water to balance peak and average demands and ensure that its demand does not exceed NCWSA's supply. For wastewater discharges, Rivian would operate its own on-site industrial WWTP, with the design capacity needed to pre-treat industrial wastewater flows from Rivian operations prior to discharge to the NCWSA system. Wastewater discharged by the Rivian industrial WWTP would be pre-treated to meet the NCWSA maximum allowable industrial headworks loadings for the ASE WRF and all applicable federal categorical effluent limits prior to discharge to the NCWSA system.

The other projects in the region (e.g., Stanton Springs Business Park, Takeda – Social Circle Facility, Meta – Stanton Springs Data Center, Georgia Bioscience Training Center) represent additional demands on the water supply and wastewater treatment facilities. NCWSA coordinates and plans for water supply and treatment needs in the region so the needed capacity (supply and treatment) is available to meet the current and future needs of customers. Given NCWSA's planning, including development of a new reverse-osmosis treatment facility, and the measures that Rivian would implement (e.g., storage tanks and WWTP), cumulative impacts on water supply and wastewater treatment would not be expected to be significant.

3.10.2 Air Quality and Climate Change

Emissions associated with operation of the Rivian facility have the potential to result in cumulative impacts on regional air quality. As presented in Section 3.4, the Project is in an airshed that is in attainment for the NAAQS. In accordance with the CAA, the State has developed a SIP to maintain compliance with the NAAQS. Any new emissions in the airshed, including those of the identified projects in the region, that would be subject to CAA permitting would have to comply with CAA regulations and be reviewed to ensure that air quality in the region remains in compliance with the NAAQS. Therefore, the cumulative impacts on air quality associated with the operation of the Project and the other projects in the region would not be significant.

GHG emissions associated with construction and operation of the Project would be minimal, especially when considering the GHG reductions resulting from the use of EVs and the associated reduction in emissions from less use of internal-combustion engines. As presented in Section 3.4, operation of the Project would generate average annual GHG emissions amounting to 114,087 tons per year. The annual reduction in the number of gallons of petroleum used would depend on the number of EVs produced and sold. As presented in Section 2, Rivian estimates that, at full production, up to 400,000 EVs would be manufactured each year. For a conservative estimate, LPO assumed that 100,000 Rivian EVs would be sold each year, which would result in an annual reduction in petroleum usage amounting to approximately 60.9 million gallons.

The amount of CO₂e avoided annually is calculated from the Project's annual fuel consumption savings from the sale and use of 100,000 EVs (i.e., 60.9 million gallons) multiplied by the U.S. Energy Information Administration's fuel emission factor of 19.54 pounds of CO₂e per gallon for gasoline. Therefore, the use of Rivian EVs produced by the Project would support the avoidance of approximately 595,000 tons of CO₂e per year for every 100,000 EVs sold (U.S. Environmental Protection Agency, 2023). In general, the potential benefits associated with reducing CO₂e emissions would support a reduction in GHG concentrations and reduce the associated climate change impacts (e.g., increases in atmospheric temperature, changes in precipitation, increases in the frequency and intensity of extreme weather events, rising sea levels).

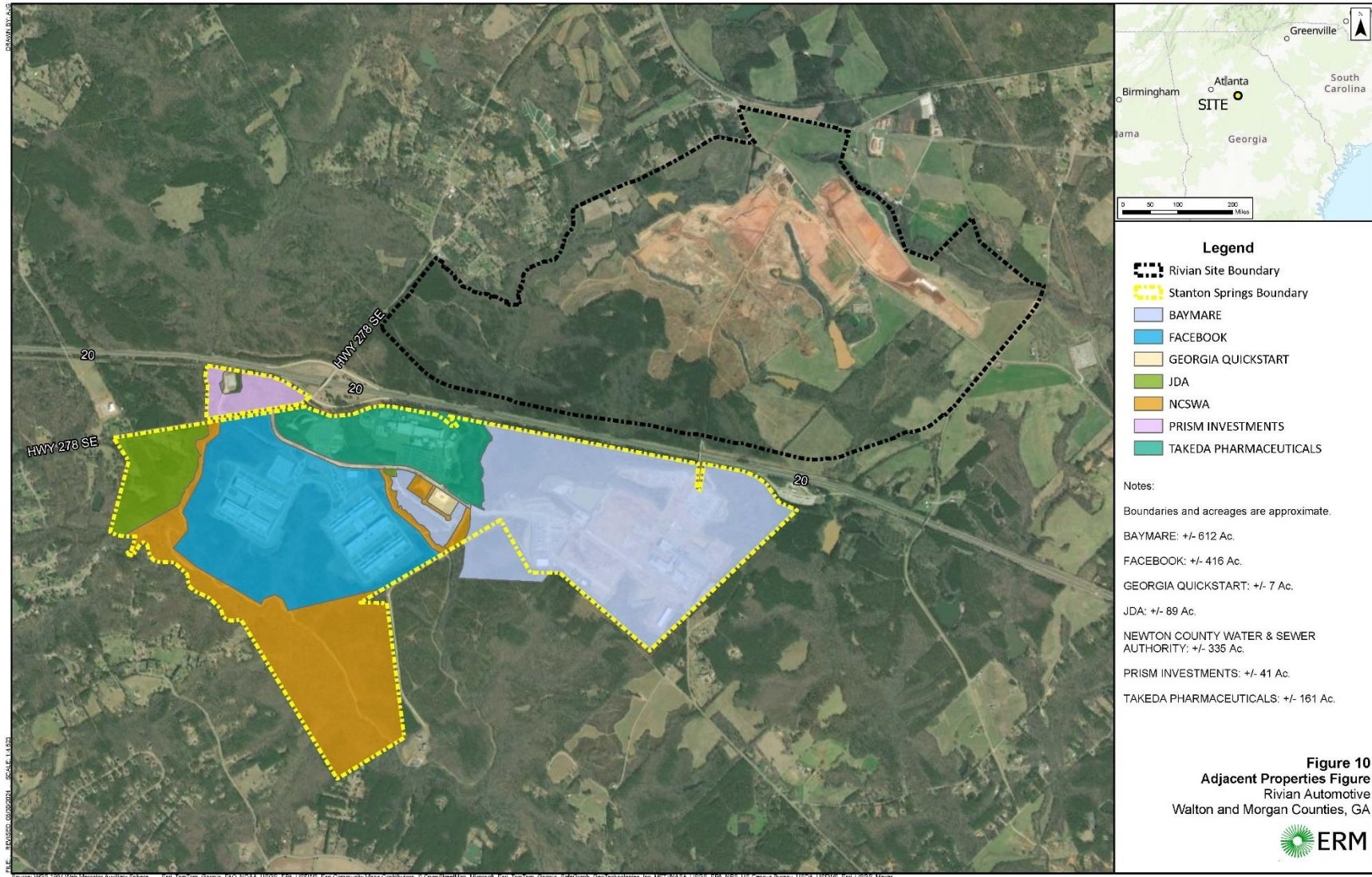


Figure 10. Adjacent Properties Figure

3.10.3 Transportation

As presented in Section 3.6, GDOT considered the additional development occurring in the region and, in response, identified and developed road improvements to provide more efficient access to the Stanton Springs North development and the surrounding area. The road improvements are separate from the Project and intended to improve surrounding infrastructure for all users, including local communities. The transportation improvements include roadway widening, a new Frontage Road along I-20, a new interstate interchange along I-10, and the construction of two bridges over CSX rail lines, along with other improvements. GDOT's improvement projects in the Stanton Springs area are expected to be completed in 2025, prior to the completion of Phase 1 of the Project (U.S. Department of Transportation 2022).⁶

GDOT has factored in the increase in traffic associated with the Project as well as the other developments in the surrounding area. Because of the road improvements that are under way or planned, cumulative impacts on transportation in the region would not be expected to be significant.

3.10.4 Socioeconomic and Environmental Justice

As provided in Section 3.7, one county and two CBGs have percentages for populations of color and/or of low-income residents that are greater than the percentages for the state. CBGs also exceed the 80th percentile for the state with respect to pollution. In addition, the percentage of the population with less than high school education in the block groups is 58.3 to 100 percent higher than the state average. In its community benefits plan, which was submitted with this application, Rivian also outlined the disadvantaged communities that are within 50 miles of the Project and confirmed its commitment to hiring at least 25 percent of its workforce from these disadvantaged communities. Overall regional development plans and the supporting infrastructure associated regional economic growth represents a general improvement in socioeconomic conditions. As outlined in its community benefits plan, Rivian has committed to competitive wages and benefits, as benchmarked to the industry average for the region. In addition, Rivian's community benefits plan outlines substantial engagement with State and local governments, educational institutions, and community organizations, with an intent to continue its outreach as development of the Project continues. In addition, Rivian is partnering with local trade schools, colleges, and universities to develop and recruit the skilled workforce needed to support the Project. For example, Rivian has partnered with the Technical College System of Georgia to launch training and apprenticeship programs in industrial maintenance and tool-and-die operations. Rivian has also started engaging with local colleges and universities to identify potential employment candidates at all levels and establish career paths through the Rivian organization. Rivian's employment is expected to increase the median salary of the surrounding area, provide for increased employment opportunities for suppliers and support businesses, increase direct and indirect spending in the local economy, and generate additional tax revenue to support the local communities. The establishment of additional infrastructure in the region (e.g., roadway improvements, upgraded or new electric transmission facilities), as well as the new industries coming into the region, is anticipated to provide similar opportunities and improvements.

⁶ Additional information and maps of the GDOT interchange project are available online at <https://gdot.maps.arcgis.com/sharing/rest/content/items/34b1c35410604bdfa61b0ac78de2aae0/data>.

Because of the improvements, training programs, increased job opportunities, and improved infrastructure in the area, no significant cumulative impacts on socioeconomic resources or EJ populations are anticipated.

4. FINDING OF NO SIGNIFICANT IMPACT

Based on this EA, DOE has determined that providing a federal loan to Rivian to build an EV manufacturing facility will not have a significant effect on the human environment. Preparation of an environmental impact statement is therefore not required, and DOE is issuing this Finding of No Significant Impact.

This Finding of No Significant Impact should not be construed a final decision about issuance of a federal loan.

Anna Eskridge, Ph.D.
NEPA Compliance Officer
DOE Loan Programs Office

Date

5. LIST OF AGENCIES CONTACTED

U.S. Environmental Protection Agency

U.S. Army Corps of Engineers, Savannah District

Federal Aviation Administration

U.S. Fish and Wildlife Service

Georgia Department of Natural Resources, Environmental Protection Division

Georgia Department of Economic Development

Georgia Department of Transportation

Georgia Department of Natural Resources, Historic Preservation Division

Georgia State Historic Preservation Office

Georgia Department of Community Affairs

Northeast Georgia Regional Commission

Joint Development Authority of Jasper County, Morgan County, Newton County, and Walton County

Newton County Water and Sewerage Authority

Alabama-Quassarte Tribal Town

Cherokee Nation

Coushatta Tribe of Louisiana

Eastern Band of Cherokee Indians

Muscogee (Creek) Nation

Lower Muskogee Creek Tribe

6. LIST OF PREPARERS

6.1 U.S. Department of Energy

Kara Harris, B.S., Environmental Science – Soils; M.P.A., Environmental Science and Policy; 22 years of experience

Todd Stribley, B.S., Biology; M.S., Environmental Science and Public Policy; 30 years of experience

Patrick Read, B.A., Environmental Studies; M.S., Environmental Science and Policy; 22 years of experience

Elizabeth Perera, M.E.M., Environmental Management and Policy, Climate Policy; M.P.H., Environmental Health and Climate Change; B.A., Environmental Science and Policy Studies; 20 years of experience

6.2 Rivian

Mike Barber, B.S., Environmental Science and Geology; 13 years of experience

Chris Graber, B.S., Civil Engineering; 23 years of experience

Eric Smith, P.E., B.S., Civil Engineering; MBA; 15 years of experience

Susie White, P.E., B.S., Civil Engineering; 8 years of experience

Kelly Neill, B.S., Architecture; Master of Architecture; 15 years of experience

Holly Henderson, CSP, B.S., Environmental Engineering; M.S., Civil and Environmental Engineering; 8 years of experience

Alicia Ly, QISP, B.S., Environmental Science; M.S., Conservation Biology; 6 years of experience

Jacob Walter Stephan, B.S., Environmental Science; 4 years of experience

Isreal Hodges, BCEE, B.S., Civil Engineering; M.S., Environmental Engineering; 12 years of experience

Pamela Henriksen, B.S., Aquatic Biology; 20 years of experience

Mark Garza, 30 years of experience

Nanette Dawn Perry, P.E., B.S., Chemical Engineering; B.S., Mathematics; Tech Elective: Environmental Engineering; 32 years of experience.

Scott Hacke, B.S., Systems Engineering and Design (Environmental Emphasis); 32 years of experience.

B. Veronika Ostrak, B.S. Environmental & Occupational Health; M.B.A; 13 years of experience

6.3 ERM Consulting & Engineering, Inc (Consultant to Rivian)

David Murtha, QEP, CVI, TWIC, B.S., Environmental Sciences; A.S., Biology and Chemistry; 44 years of experience

Kent McCroskey, B.S., Environmental Science; 31 years of experience

Christine Ferry, B.S., Chemistry; M.A., Chemistry; 6 years of experience

Laura Sondag-Braun, B.S., Biology and Environmental Science; M.S.E.S., Applied Ecology;
10 years of experience

Jacque Payette, RPA, M.A., Archaeology, Physical Anthropology, and English; 25+ years of
experience

Renee Hoyos, B.A., Theater Arts; M.A.M., Agriculture and Management; M.S., Avian Sciences;
25 years of experience

Destiny Kerr, B.S., Environmental Sciences, Soil Science; M.S., Plant and Soil Sciences;
3 years of experience

Anthony Agresti, B.A., Meteorology; 37 years of experience

Ben Sussman, B.S., Science, Technology, and Society; M.C.R.P., City and Regional Planning;
23 years of experience.

Austin Groff, B.S., Biology; M.S., Environmental Science; 5 years of experience

Anthony Cimpi, PWS, A.S., Environmental Science; B.T., Renewable Resources; 13 years of
experience

Kristina Garcia, P.G., B.S., Geology, Hydrogeology Concentration; M.S., Geology, Exploration
Geochemistry, and Hydrogeology Concentration; 37 years of experience

Poppy Milliken, B.A., English; M.A., Writing and Publishing; 6 years of experience

Naomi Walker, B.S., Civil Engineering; M.S., Urban Planning and Environmental Policy; 4 years
of experience

Matt Goff, B.S., Biological Sciences; M.S., Biological Sciences; 25 years of experience

Heather Adams, R.P.A., B.S., Liberal Arts, Anthropology, Archaeology, and Geology;
M.S., Cultural Resource Management; 21 years of experience

7. REFERENCES

- American National Standards Institute. 2013. *S12.9-2013, Quantities and Procedures for Description and Measurement of Environmental Sound*. Part 3: Short-Term Measurements with an Observer Present.
- Bolt, Beranek and Newman, Inc. 1971. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*.
- City of Social Circle. 2023. *Code of Ordinances*. Chapter 9, General Offenses. Article IV, Noise Regulations.
- DataKustik, GmbH. 2006. *Computer-Aided Noise Abatement Model CadnaA*. Munich, Germany.
- Federal Register. 1994. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Available: <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>.
- Georgia Department of Community Affairs. 2023. *Newton County Comprehensive Plan Update*. Available: <https://www.dca.ga.gov/sites/default/files/newtoncounty.complanadopted.pdf>.
- Georgia Department of Economic Development. 2023a. *Rivian Agreement Basics, Summary of Incentives*. Available: [Rivian Agreement Basics \(stantonsprings.com\)](https://www.stantonsprings.com). September.
- Georgia Department of Economic Development. 2023b. *First Amendment to Economic Development Agreement*. Available: [First Amendment to Economic Development Agreement \(stantonsprings.com\)](https://www.stantonsprings.com). September.
- Georgia Department of Economic Development. 2022. *Economic Development Agreement; Rivian Horizon, LLC, and the State of Georgia and the Georgia Department of Economic Development and the Joint Development Authority of Jasper County, Morgan County, Newton County and Walton County*. Available: [Economic Development Agreement \(stantonsprings.com\)](https://www.stantonsprings.com). May.
- Georgia Department of Transportation. 2022a. *Interchange Justification Report, I-10 at Old Mill Road Interchange (PI 0018361), Morgan County*. Federal Highway Administration, Georgia Division. March. Available: <https://gdot.maps.arcgis.com/sharing/rest/content/items/34b1c35410604bdfa61b0ac78de2aae0/data>.
- Georgia Department of Transportation. 2022b. *Existing-Year Traffic Data and Future-Year Volumes Memo (PI 0017219, PI 0018363, PI 0018361)*. June. Available: <https://gdot.maps.arcgis.com/sharing/rest/content/items/34b1c35410604bdfa61b0ac78de2aae0/data>.
- Georgia Environmental Connections Online. 2024. *Permit Application #29046*. Available: <https://geco.gaepd.org/Permits/Application.aspx?id=29046>.
- Georgia Environmental Protection Division. n.d. *Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions*. Available: [Toxic Impact Assessment Guideline | Environmental Protection Division \(georgia.gov\)](https://www.georgia.gov).
- Georgia Power. 2021. *IMPLAN, Economic Impact Analysis*. Community and Economic Development.
- Jacobs. 2023. *Stanton Springs North Traffic Engineering Report*. Available: [Jacobs Stanton Springs North Traffic Engineering Report](https://www.jacobs.com). July.

- Morgan County. n.d. *Morgan County Zoning Ordinance*. Department of Planning and Development. Available: [Morgan County Zoning Ordinance | Morgan County, GA – Official Website \(morgancountyga.gov\)](#).
- Mosaic Consulting, Nelsnick Enterprises, and Hall Consulting. 2016 (updated by the Northeast Georgia Regional Commission, 2022). *2022–2036 Issue-Based Comprehensive Plan*. Available: https://www.morgancountyga.gov/DocumentCenter/View/3333/2022-2036MorganCountyJointCompPlan_FinalDraft_Reduced_Size.
- Newton County Water and Sewerage Authority. 2022. *Water Quality Report*. Available: <https://ncwsa.us/wp-content/uploads/124442-NCWSA-2022-Water-Quality-Report.pdf>.
- Northeast Georgia Regional Commission. 2022. *Walton County Comprehensive Plan*. Available: <https://www.waltoncountyga.gov/DocumentCenter/View/5997/Walton-County-Comprehensive-Plan-June-2022>.
- Rockdale Citizen and Newton Citizen. 2023 (updated 2024). “Innovative Water Treatment Facility to Serve Rivian, Stanton Springs.” Available: https://www.rockdalenewtoncitizen.com/news/innovative-water-treatment-facility-to-serve-rivian-stanton-springs/article_b8cf9416-360b-11ee-ba6a-63ad329e900c.html.
- U.S. Census Bureau. 2020. *QuickFacts*. Available: [U.S. Census Bureau QuickFacts: United States](#). Accessed: September 18, 2023.
- U.S. Environmental Protection Agency. n.d.a. *Community Air Monitoring Program Guidelines*.
- U.S. Environmental Protection Agency. n.d.b. *AERMOD Air Quality Dispersion Modeling System*, v22112. Available: [Air Quality Dispersion Modeling - Preferred and Recommended Models | US EPA](#).
- U.S. Environmental Protection Agency. 2016. *Technical Guidance for Assessing Environmental Justice in Regulatory Analysis*. Available: https://www.epa.gov/sites/default/files/2016-06/documents/ejtg_5_6_16_v5.1.pdf.
- U.S. Environmental Protection Agency. 2024. *EJScreen: Environmental Justice Screening and Mapping Tool*, version 2.3. Available: [EJScreen: Environmental Justice Screening and Mapping Tool | US EPA](#). Accessed: August 2024.
- U.S. Environmental Protection Agency. 2023. *Greenhouse Gas Equivalencies Calculator*. Available: <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results>.
- U.S. Environmental Protection Agency. 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*. Office of Noise Abatement and Control. Report Number EPA 550/9-74-009. Washington, D. C. 20460
- Urman, Stephen C. 1987. *A Survey of Railroad Occupational Noise Sources*. Transportation Research Record. Issue 1143. ISSN: 0361-1981.
- Walton County. 2014. *Code of Ordinances*. Chapter 9, Environment. Article V, Noise.

APPENDIX A AGENCY AND TRIBAL CONSULTATION



Department of Energy

Washington, DC 20585

August 31, 2023

Mr. Jeff Cown, Director, Environmental Protection Division
Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive, SE
14th Floor East Tower - Suite 1456
Atlanta, GA 30334-9000

SUBJECT: Intent to Prepare an Environmental Assessment (EA) for a Proposed Federal Loan to Rivian New Horizon, LLC for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia

Dear Mr. Cown,

Under Section 136 of the Energy Independence and Security Act of 2007, which established the Advanced Technology Vehicles Manufacturing Loan (ATVM) program, the U.S. Department of Energy (DOE) is evaluating whether to provide a Federal loan to Rivian New Horizon, LLC (Rivian) to support the construction and initial startup of an electric vehicle manufacturing facility also known as “Project Horizon” in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia. The facility will be used to build electric vehicles. The decision to prepare an EA was made in accordance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and DOE’s implementing procedures for compliance with NEPA (10 CFR Part 1021).

The purpose and need for DOE’s action is to comply with our mandate under Section 136 of the Energy Independence and Security Act to select projects for financial assistance that are consistent with the goals of the Act. Pursuant to the Act, the ATVM program was established to provide loans to automobile and automobile parts manufacturers for the cost of re-equipping, expanding, or establishing manufacturing facilities in the United States to produce advanced technology vehicles or qualified components. DOE has determined that the construction of the electric vehicle manufacturing facility as proposed by Rivian is consistent with the goals of the Act and is using the NEPA process to assist in determining whether to issue a loan to Rivian.

The project activities in Georgia involve constructing a new production campus on a greenfield site 40 miles east of Atlanta in Walton and Morgan Counties in an industrial business park referred to as Stanton Springs. The project site was assembled from 45 individual parcels of land and contains approximately 1,728 acres. The first phase of the new manufacturing facility will consist of an estimated 3.5 million square feet.

When completed, up to 1,000 acres may be permanently affected. Permanent features may include: 100 acres of new manufacturing structures; 10 acres of additional structures and a central utility plant; 160 acres of roads, sidewalks, parking lots, and hardscaped yards; 45 acres of rail yards; 35 acres of stormwater retention basins; and 20 acres of gravel pads to support utilities. Additionally, during construction, an additional 13 acres may be temporarily affected. The remainder of the project site will consist of grassed areas, wooded areas, landscaped areas, slopes, berms, and land in its current vegetative state.

The DOE NEPA regulations provide for the notification of host states of NEPA determinations and for the opportunity for host states to review EAs prior to DOE approval. This process is intended to improve coordination and to facilitate early and open communication. DOE will provide the draft EA to you for your review and comment.

If you or your staff would like to receive further information concerning this project or DOE's NEPA process, please contact me in the DOE Loan Programs Office at (202) 586-8716, or email at lpo_environmental@hq.doe.gov.

Sincerely,

Kara Harris
NEPA Document Manager
Loan Programs Office

Attachments:

Attachment 1: Site Location Map

Attachment 2: Site Layout Map

cc: Rodney Parker, Regulatory Archeologist and District Tribal Liaison
U.S. Army Corps of Engineers, Savannah District

Adam F. White, PWS
U.S. Army Corps of Engineers, Savannah District
Regulatory Division, Piedmont Branch

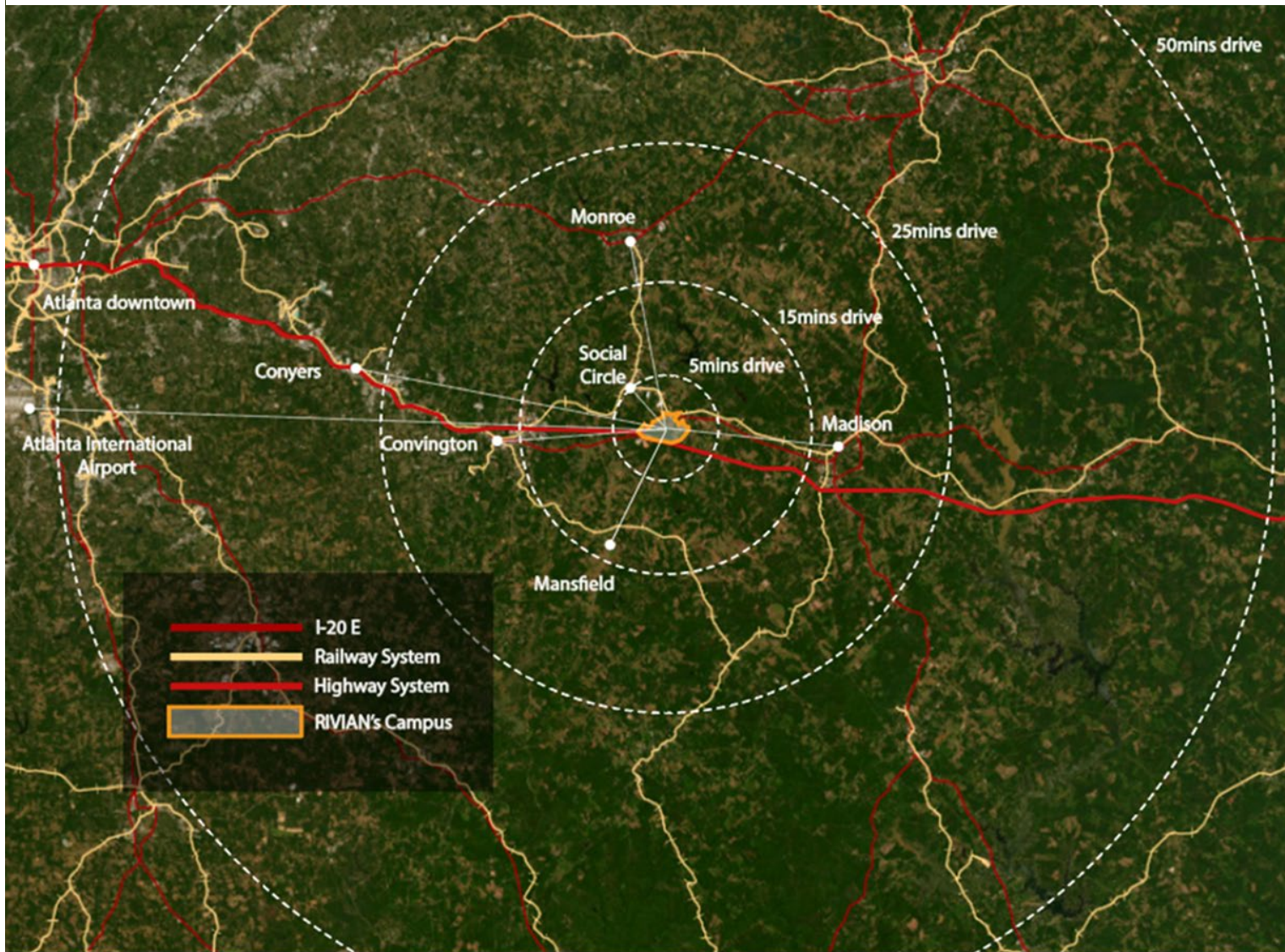
Stacy Rieke, Environmental Review and Preservation Planning Program Manager
Georgia Department of Community Affairs

Jennifer Dixon, Division Director, Historic Preservation Division
Georgia Department of Community Affairs

Heather Mustonen, Cultural Resources Section Manager
Office of Environmental Services

Marian S. McCormick, Principal Chief
The Lower Muskogee Creek Tribe

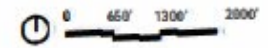
Attachment 1: Site Location Map



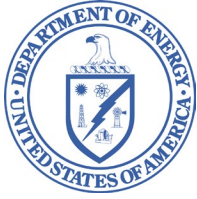
Attachment 2: Site Layout Map



Legend
- - - Property Line
- - - County Line



Example Tribal Correspondence



Department of Energy

Washington, DC 20585

August 31, 2023

Chief Wilson Yargee
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883

SUBJECT: Intent to Prepare an Environmental Assessment for a Proposed Federal Loan to Rivian New Horizon, LLC for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia

Dear Chief Yargee,

The U.S. Department of Energy (DOE) is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) to assist in determining whether to issue a Federal loan to Rivian New Horizon, LLC (Rivian) to support the construction of an electric vehicle manufacturing facility, known as “Project Horizon” in the Stanton Springs North Industrial Development in Walton and Morgan Counties, GA. The facility would be used as a manufacturing facility to produce electric vehicles. DOE has determined that this consideration is subject to Section 106 of the National Historic Preservation Act (NHPA). Therefore, as part of this environmental review process, DOE is also conducting a historic resource review in compliance with Section 106 of the NHPA.

The project activities involve constructing an electric vehicle manufacturing campus on a greenfield site roughly 40 miles east of Atlanta in Walton and Morgan Counties, Georgia. The project site consists of an assemblage of 45 parcels of land containing approximately 1,728 acres, in the vicinity of Interstate Highway I-20 and US Highway 278 in Walton and Morgan Counties, Georgia. The first phase of the new manufacturing facility will consist of an estimated 3.5 million square feet.

When completed, up to 1,000 acres may be permanently affected. Permanent features may include 100 acres of new manufacturing structures; 10 acres of additional structures and a central utility plant; 160 acres of roads, sidewalks, parking lots, and hardscaped yards; 45 acres of rail yards; 35 acres of stormwater retention basins; and 20 acres of gravel pads to support utilities. Additionally, during construction, an additional 13 acres may be temporarily affected. The remainder of the project site will consist of grassed areas, wooded areas, landscaped areas, slopes, berms, and land in its current vegetative state.

As a result of this economic development, Rivian will create roughly 3,300 jobs during construction, 8,003 jobs during the operation of Phase I and 13,803 jobs during the operation of Phase II.

This letter is intended to notify you of the proposed Federal project, identify if you have any interest in the proposed project site, and provide you with the opportunity to comment and engage DOE in government-to-government consultation on the proposed project. Any comments or concerns you provide will help ensure that DOE considers Tribal interests and complies with its NEPA and NHPA Section 106 responsibilities. We want to give you the opportunity to raise any issues or concerns you may have regarding the sites.

I would greatly appreciate notification if you do or do not have an interest in the project site, as well as any comments or concerns you have, within thirty (30) days of the date of this letter. Should you have an interest in the project site, I will provide you with additional information pursuant to NEPA and the NHPA as it becomes available. Please provide your notification of interest and any comments or concerns by email at lpo_environmental@hq.doe.gov.

Respectfully,

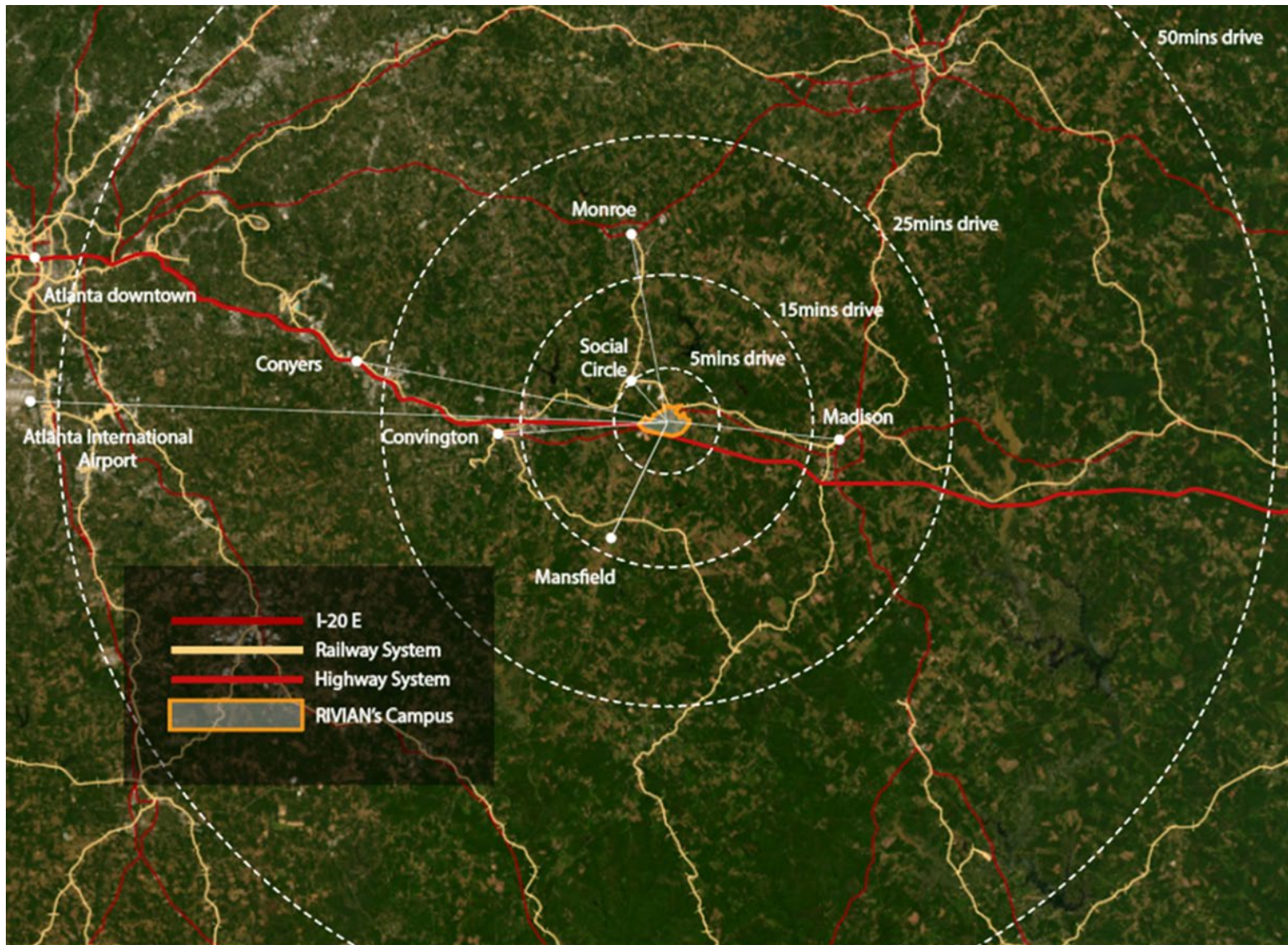
Kara Harris
NEPA Document Manager
Loans Program Office

Attachments:

Attachment 1: Site Location Map
Attachment 2: Site Layout Map

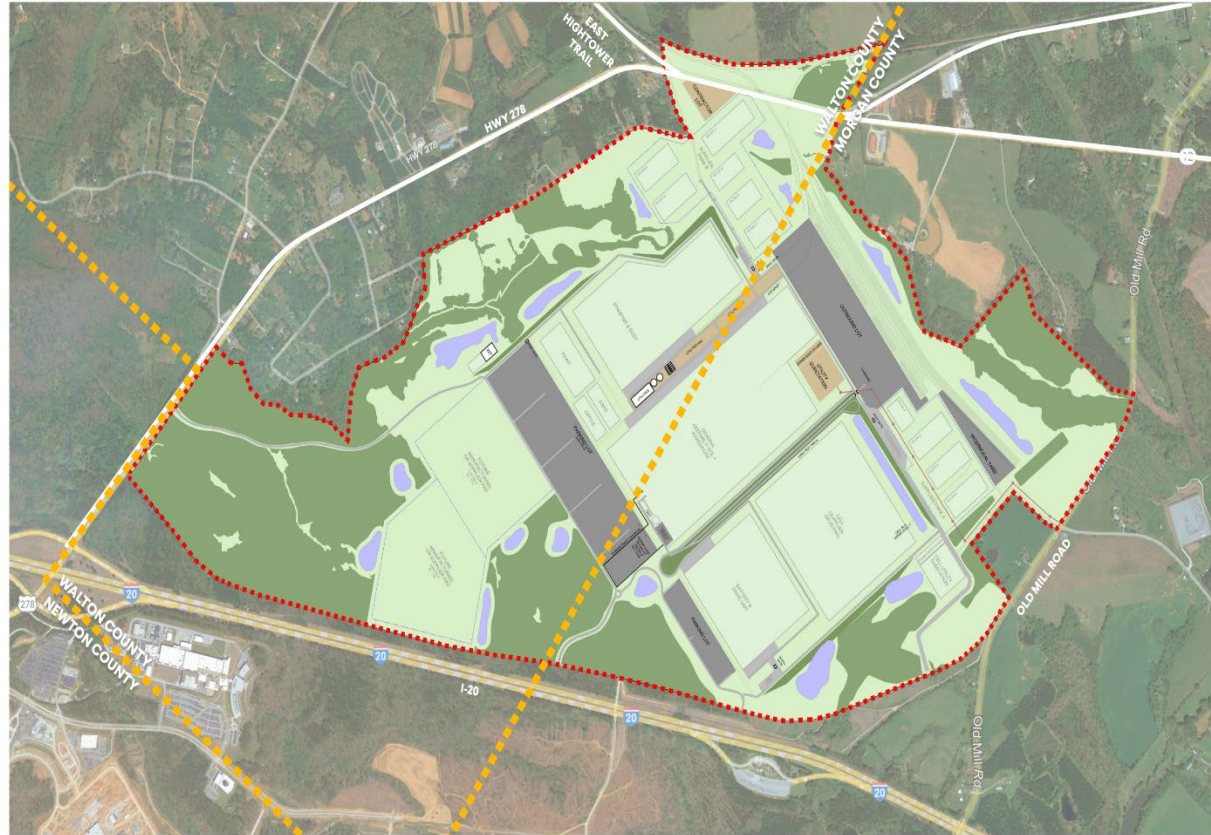
Cc: Ben Yahola, THPO

Attachment 1: Site Location Map



Attachment 2: Site Layout Map

Project Site Layout



- Legend**
- Property Line
 - County Line



As part of the Programmatic Agreement, the following Federally recognized tribes were consulted by US Army Corps of Engineers:

- Absentee-Shawnee Tribe of Oklahoma
- Alabama Quassarte Tribal Town
- Chickasaw Nation
- Coushatta Tribe of Louisiana
- Kialegee Tribal Town
- Muscogee Nation
- Poarch Band of Creek Indians
- Seminole Nation of Oklahoma
- Seminole Tribe of Florida
- Thlopthlocco Tribal Town
- Shawnee Tribe of Oklahoma
- Cherokee Nation
- Eastern Band of Cherokee Indians
- United Keetoowah Band of Cherokee Indians



Department of Energy

Washington, DC 20585

October 3, 2024

Jeff Cown
Director, Environmental Protection Division
Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive, SE
East Tower, Suite 1456
Atlanta, GA 30334

SUBJECT: Draft Environmental Assessment for a Proposed Federal Loan to Rivian New Horizon, LLC for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia

Dear Mr. Cown:

The U.S. Department of Energy (DOE), Loan Programs Office (LPO) prepared a Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) pursuant to the National Environmental Policy Act (NEPA) to consider the environmental impacts of its decision whether or not to provide a Federal loan to Rivian Automotive, Inc. (Rivian) for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area, in Morgan and Walton Counties, Georgia (the Project). The decision to prepare an EA was made in accordance with the requirements of NEPA, the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and DOE's implementing procedures for compliance with NEPA (10 CFR Part 1021).

LPO provides loans and loan guarantees under four programs – the Innovative Energy Loan Guarantee Program, the Advanced Technology Vehicles Manufacturing Program (ATVM), the Tribal Energy Financing Program, and the Carbon Dioxide Transportation Infrastructure Program. The loan under consideration to Rivian is under the Energy Independence and Security Act of 2007 (Act), which established the ATVM program. Pursuant to the Act, the ATVM program was established to provide loans to automobile and automobile parts manufacturers for the cost of re-equipping, expanding, or establishing manufacturing facilities in the United States to produce advanced technology vehicles or qualified components. DOE has determined that the construction of the electric vehicle manufacturing facility as proposed by Rivian is consistent with the goals of the Act and is using the NEPA process to assist in determining whether to issue a loan to Rivian to support the proposed project.

The Project is located on a greenfield site 40 miles east of Atlanta in the Stanton Springs North Development Area, located in Morgan and Walton Counties, Georgia. As presented in the EA, the Project site encompasses approximately 1,978 acres, within which up to 1,000 acres will be developed for the new manufacturing structures and facilities; roads, sidewalks, parking lots, a rail yard, stormwater retention basins; gravel pads and utilities, and associated general landscaping.

As an interested party and in accordance with DOE NEPA regulations, the Draft EA with the draft Finding of No Significant Impact (FONSI) is included in the following link:

<https://www.energy.gov/lpo/ea-2251-draft-environmental-assessment-rivian-stanton-springs-north-morgan-and-walton-counties>

Please review and provide any comment you may have via email or mail by **Monday, November 4th 2024 (comments must be received by this date):**

Email:

Please include “Project Horizon EA” in the subject line
LPO_Environmental@hq.doe.gov

Mail:

Rivian Project Horizon Environmental Assessment
Department of Energy – Loan Programs Office
c/o ICF Consulting
1902 Reston Metro Plaza
Reston, VA 20190

Sincerely,

TODD

STRIBLEY

Todd Stribley

NEPA Compliance Officer

Loan Programs Office

Digitally signed by
TODD STRIBLEY
Date: 2024.10.03
15:36:22 -06'00'

cc: Rodney Parker
Regulatory Archeologist and District Tribal Liaison
USACE, Savannah District
100 W. Oglethorpe Rd
Savannah, GA 31401

Adam F. White, PWS
U.S. Army Corps of Engineers
Savannah District
Regulatory Division, Piedmont Branch
4751 Best Road, Suite 140
College Park, Georgia 30337-5600

Stacy Rieke
Environmental Review and Preservation Planning Program Manager
Georgia Department of Community Affairs

Jennifer Dixon
Division Director, Historic Preservation Division
Georgia Department of Community Affairs

Heather Mustonen
Cultural Resources Section Manager
Office of Environmental Services
One Georgia Center - 16th Floor
Atlanta, GA 30308

Marian S. McCormick
Principal Chief
Tama Tribal Town
107 Tall Pine Drive
Whigham, GA 39897



Department of Energy

Washington, DC 20585

October 3, 2024

Adam F. White, PWS
U.S. Army Corps of Engineers, Savannah District
Regulatory Division, Piedmont Branch
4751 Best Road, Suite 140
College Park, Georgia 30337-5600

SUBJECT: Draft Environmental Assessment for a Proposed Federal Loan to Rivian New Horizon, LLC for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia

Dear Adam White,

The U.S. Department of Energy (DOE), Loan Programs Office (LPO) prepared a Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) pursuant to the National Environmental Policy Act (NEPA) to consider the environmental impacts of its decision whether or not to provide a Federal loan to Rivian Automotive, Inc. (Rivian) for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area, in Morgan and Walton Counties, Georgia (the Project). The decision to prepare an EA was made in accordance with the requirements of NEPA, the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and DOE's implementing procedures for compliance with NEPA (10 CFR Part 1021).

LPO provides loans and loan guarantees under four programs – the Innovative Energy Loan Guarantee Program, the Advanced Technology Vehicles Manufacturing Program (ATVM), the Tribal Energy Financing Program, and the Carbon Dioxide Transportation Infrastructure Program. The loan under consideration to Rivian is under the Energy Independence and Security Act of 2007 (Act), which established the ATVM program. Pursuant to the Act, the ATVM program was established to provide loans to automobile and automobile parts manufacturers for the cost of re-equipping, expanding, or establishing manufacturing facilities in the United States to produce advanced technology vehicles or qualified components. DOE has determined that the construction of the electric vehicle manufacturing facility as proposed by Rivian is consistent with the goals of the Act and is using the NEPA process to assist in determining whether to issue a loan to Rivian to support the proposed project.

The Project is located on a greenfield site 40 miles east of Atlanta in the Stanton Springs North Development Area, located in Morgan and Walton Counties, Georgia. As presented in the EA, the Project site encompasses approximately 1,978 acres, within which up to 1,000 acres will be developed for the new manufacturing structures and facilities; roads, sidewalks, parking lots, a rail yard, stormwater retention basins; gravel pads and utilities, and associated general landscaping.

As an interested party and in accordance with DOE NEPA regulations, the Draft EA with the draft Finding of No Significant Impact (FONSI) is included in the following link: <https://www.energy.gov/lpo/ea-2251-draft-environmental-assessment-rivian-stanton-springs-north-morgan-and-walton-counties>

Please review and provide any comment you may have via email or mail by **Monday, November 4th 2024 (comments must be received by this date):**

Email:

Please include “Project Horizon EA” in the subject line
LPO_Environmental@hq.doe.gov

Mail:

Rivian Project Horizon Environmental Assessment
Department of Energy – Loan Programs Office
c/o ICF Consulting
1902 Reston Metro Plaza
Reston, VA 20190

Sincerely,

TODD

STRIBLEY

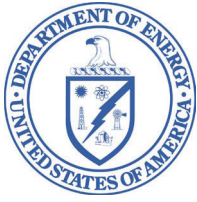
Todd Stribley

NEPA Compliance Officer

Loan Programs Office

Digitally signed by
TODD STRIBLEY
Date: 2024.10.03
17:22:30 -06'00'

**Example Tribal Correspondence
Draft Environmental Assessment**



Department of Energy

Washington, DC 20585

October 3, 2024

Chief Wilson Yargee
Alabama-Quassarte Tribal Town
PO Box 187
Wetumka, OK 74883

SUBJECT: Draft Environmental Assessment for a Proposed Federal Loan to Rivian New Horizon, LLC for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area in Walton and Morgan Counties, Georgia

Dear Chief Yargee,

The U.S. Department of Energy (DOE), Loan Programs Office (LPO) prepared a Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) pursuant to the National Environmental Policy Act (NEPA) to consider the environmental impacts of its decision whether or not to provide a Federal loan to Rivian Automotive, Inc. (Rivian) for an Electric Vehicle Manufacturing Facility in the Stanton Springs North Development Area, in Morgan and Walton Counties, Georgia (the Project). The decision to prepare an EA was made in accordance with the requirements of NEPA, the Council on Environmental Quality regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and DOE's implementing procedures for compliance with NEPA (10 CFR Part 1021).

LPO provides loans and loan guarantees under four programs – the Innovative Energy Loan Guarantee Program, the Advanced Technology Vehicles Manufacturing Program (ATVM), the Tribal Energy Financing Program, and the Carbon Dioxide Transportation Infrastructure Program. The loan under consideration to Rivian is under the Energy Independence and Security Act of 2007 (Act), which established the ATVM program. Pursuant to the Act, the ATVM program was established to provide loans to automobile and automobile parts manufacturers for the cost of re-equipping, expanding, or establishing manufacturing facilities in the United States to produce advanced technology vehicles or qualified components. DOE has determined that the construction of the electric vehicle manufacturing facility as proposed by Rivian is consistent with the goals of the Act and is using the NEPA process to assist in determining whether to issue a loan to Rivian to support the proposed project.

The Project is located on a greenfield site 40 miles east of Atlanta in the Stanton Springs North Development Area, located in Morgan and Walton Counties, Georgia. As presented in the EA, the Project site encompasses approximately 1,978 acres, within which up to 1,000 acres will be developed for the new manufacturing structures and facilities; roads, sidewalks, parking lots, a rail yard, stormwater retention basins; gravel pads and utilities, and associated general landscaping.

As an interested party and in accordance with DOE NEPA regulations, the Draft EA with the draft Finding of No Significant Impact (FONSI) is included in the following link: <https://www.energy.gov/lpo/ea-2251-draft-environmental-assessment-rivian-stanton-springs-north-morgan-and-walton-counties>

Please review and provide any comment you may have via email or mail by **Monday, November 4th 2024 (comments must be received by this date):**

Email:

Please include “Project Horizon EA” in the subject line
LPO_Environmental@hq.doe.gov

Mail:

Rivian Project Horizon Environmental Assessment
Department of Energy – Loan Programs Office
c/o ICF Consulting
1902 Reston Metro Plaza
Reston, VA 20190

Sincerely,

**TODD
STRIBLEY**

Digitally signed by
TODD STRIBLEY
Date: 2024.10.03
17:28:10 -06'00'

Todd Stribley
NEPA Compliance Officer
Loan Programs Office

The following Federally recognized tribes were sent copies of the Draft Environmental Assessment:

- Absentee-Shawnee Tribe of Oklahoma
- Alabama Quassarte Tribal Town
- Chickasaw Nation
- Coushatta Tribe of Louisiana
- Kialegee Tribal Town
- Muscogee Nation
- Poarch Band of Creek Indians
- Seminole Nation of Oklahoma
- Seminole Tribe of Florida
- Thlopthlocco Tribal Town
- Shawnee Tribe of Oklahoma
- Cherokee Nation
- Eastern Band of Cherokee Indians
- United Keetoowah Band of Cherokee Indians

APPENDIX B PERMITS AND APPROVALS

Permits and Approvals Planned for Project

Permit Name	Permitting Agency	Permit Applicant	Permit Approval/Expected Approval Date
Section 404 Individual Permit	USACE – Savannah District	GDEcD/JDA	Original: December 27, 2022 Modification: March 15, 2023
Construction Stormwater Notice of Intent (NOI) in compliance with GA NPDES Construction Stormwater General Permit	GA EPD	GDEcD/JDA	September 2022
Land Disturbance Permit	Walton County	GDEcD/JDA	July 2022
EPD 401 Water Quality Certification Concurrence	GADNR-EPD	GDEcD/JDA	October 2022
Stream buffer variance	GADNR-EPD	GDEcD/JDA	November 2022
Blasting Permit	State Fire Marshall	GDEcD/JDA	November 2023
EPA Hazardous Waste Generator ID	Georgia EPD	Rivian	January 2024
Utility approvals	Walton Electric Membership	Rivian	October 2023
Building Permits for grading, wet utilities, central utilities	Walton County Planning Dept	Rivian	Commence January 2024
Building Permits for core and shell, mechanical/electrical/ plumbing, tool install	Walton County Planning Dept	Rivian	Commence March 2024
GA NPDES Industrial Stormwater General Permit	Georgia EPD	Rivian	June 2024
Hazardous Materials Storage Plan Review	State Fire Marshal Walton County Planning Dept	Rivian	May 2024
Hazardous Materials Storage Operating Permits	State Fire Marshal	Rivian	January 2025
Industrial Wastewater Pretreatment Discharge Permit	Newton County Water and Sewerage Authority (NCWSA)	Rivian	March 2024
Construction Air Permit Application	Georgia EPD	Rivian	Issued August 20, 2024
Title V Operating Permit Application	Georgia EPD	Rivian	April 2025
GA NPDES Construction Stormwater General permit NOI transfer to Rivian General Contractor	Georgia EPD	Rivian	December 2023

APPENDIX C ENVIRONMENTAL COMPLIANCE MEASURES

The following studies and reports can be found at <http://www.stantonsprings.com/rivian.html>:

- **USACE Memorandum for Record Permit Number SAS-2020-00182**

http://www.stantonsprings.com/uploads/7/5/0/2/75024267/ssn_all_report_usace_environmental_assessment.pdf

- **Economic Development Agreement with the State of Georgia, Georgia Department of Economic Development, and Joint Development Authority of Jasper County, Morgan County, Newton County, and Walton County**

http://www.stantonsprings.com/uploads/7/5/0/2/75024267/jda-rivian_-_economic_development_agreement-_fully_executed_5.2.22.pdf

- **Programmatic Agreement**

http://www.stantonsprings.com/uploads/7/5/0/2/75024267/ssn_all_agreement_shpo_programmatic_agreement.pdf

- **Air Quality Permit**

<https://permitsearch.gaepd.org/permit.aspx?id=PDF-OP-29046>

- **Stanton Springs North Traffic Engineering Report**

http://www.stantonsprings.com/uploads/7/5/0/2/75024267/ssn_site_report_july_2023_jacobs_traffic_engineering_report.pdf

Unique Hazardous Material Considerations

Product	International Fire Code Hazard Class	Unique Storage, Handling, Disposal Measures
Glycol	Combustible Liquid, IIIB	None
Brake Fluid	Combustible Liquid, IIIB	None
Ethanol based washer fluid	Flammable Liquid, IB	Flammable liquid will have indoor storage restriction based on quantity and hazard classification of area. Disposed of as ignitable hazardous waste.
Refrigerant	Flammable Gas	Flammable gas will have indoor storage restriction based on quantity and hazard classification of area. Collected for recycling and reuse using certified collection carts
Gear Oil	Combustible Liquid, IIIB	None
Hydraulic Fluid	Combustible Liquid, IIIB Toxic	Toxic liquid will have indoor storage restriction based on quantity and hazard classification of area.
Compressed gasses (argon, CO2)	Compressed gas	Store indoor portable cylinders so they cannot be damaged or knocked over.
Liquid Nitrogen	Cryogenic Liquid	Stored in an inspected and certified vessel. Oxygen monitoring is available where there may be risk of displacement and asphyxiation. Handle with appropriate PPE.
Battery Sealant & Adhesive	Flammable Liquid, IB Toxic Combustible Liquid, IIIA Combustible Liquid, IIIB	Flammable and toxic liquid will have indoor storage restrictions based on quantity and hazard classification of area. Ventilation will be used where toxic materials are loaded and applied. Dispose of ignitable or toxic characteristic adhesives as hazardous waste.
Vehicle coatings	Flammable Liquid, IB Combustible Liquid, IIIB	Flammable liquids will have indoor storage restrictions based on quantity and hazard classification of area. Paints and primers will be stored in flammable liquids storage rooms with additional ventilation and fire protection mitigations.
Pretreatment 5% hydrofluoric acid	Corrosive Toxic	Corrosive and toxic liquid will have indoor storage restriction based on quantity and hazard classification of area. Store only in compatible containers and away from incompatible materials. Pretreatment product will be stored in designated chemical storage area with secondary containment designed to be compatible with product. Required to follow SOP for safe handling. Dispose as corrosive hazardous waste.
Sulfuric acid 93%	Corrosive	Corrosive liquid will have indoor storage restriction based on quantity and hazard classification of area. Store only in compatible containers and on compatible containment and away from incompatible materials. Dispose as corrosive hazardous waste.
Hydrochloric Acid (HCl)	Corrosive	Corrosive liquid will have indoor storage restriction based on quantity and hazard classification of area. Store only in compatible containers and on compatible containment and away from incompatible materials. Dispose as corrosive hazardous waste.
Sodium Hydroxide (NaOH)	Corrosive	Corrosive liquid will have indoor storage restriction based on quantity and hazard classification of area. Store only in compatible containers on compatible containment and away from incompatible materials. Dispose as corrosive hazardous waste.
Sodium Bisulfite (NaHSO ₄)	Corrosive	Corrosive liquid will have indoor storage restriction based on quantity and hazard classification of area. Store only in compatible containers and on compatible containment and away from incompatible materials. Dispose as corrosive hazardous waste.

**APPENDIX D PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL
ASSESSMENT**

Categories of comment:

1. US Army Corps of Engineers (USACE) Environmental Assessment and Finding of No Significant Impact
2. Lithium battery manufacturing
3. Water Quality: Zoning requirements for Wastewater pretreatment and hazardous materials
4. Payments in Lieu of Taxes (PILOT)
5. Comments on Resource Areas (Socioeconomics, Noise, Air Quality, Transportation, Cumulative)
6. Non-Technical and Outside the Scope of the LPO Environmental Review
7. Level of NEPA Review

Commenter 1 (C1): Mr. Felton, Comments, photographs, and videos submitted on November 4th, 2024

Commenter 2 (C2): Ms. Artz, Comments submitted on October 28, 2024, November 3, 2024 (letter), and November 8, 2024

Comment No and Commenter	Comment Summary	Category of Comment	Responses
1 Commenter 1	Commenter indicates via comment, photographs, and videos that the USACE underestimated negative impacts of the project on aesthetics, wetlands, fish and wildlife, floodplains, land use, soil erosion, sedimentation, and water quality and additional investigations are needed for the effects from the past two years.	1, 6	<p>The comments express concerns regarding various environmental resource areas and issues associated with the development of the Project site by the Georgia Department of Economic Development (GDED). The USACE's Environmental Assessment and Finding of No Significant Impact Memorandum of Record for permit SAS- 2020-00182 to GDED, reviewed and assessed the impacts on the resources affected by the development of the Project site, and DOE LPO, as provided in Section 1.3.2 of DOE/EA-2251, has reviewed and incorporated by reference the review and conclusions associated with Permit No. SAS-2020-00182. For resource specific responses, please refer to the USACE EA's public comment responses found in Appendix A (ssn_all_report_usace_environmental_assessment.pdf).</p> <p>In accordance with permit SAS- 2020-00182,[permit monitoring], the state of Georgia requires Georgia's Environmental Protection Division (EPD) to conduct monthly inspections of the site as part of the site's construction stormwater permit and it has confirmed that the Project is in compliance with federal and state requirements including but not limited to the General NPDES Permit No. GAR100003 and that stormwater management complies with the Georgia Stormwater Management Manual. No changes have been made to DOE/EA-2251</p>
2 Commenter 1	Requests DOE perform an EIS.	7	As presented in Section 1,3, DOE has determined that an EA is the appropriate level of NEPA review for the Project. In accordance with NEPA, DOE's NEPA review incorporates by reference the review and conclusions associated with Permit No. SAS-2020-00182, and the scope of LPO's review focused on the operation aspects of the Project. Based on the results presented in DOE/EA-2251, LPO has issued a Finding of No Significant Impact, as provided in Section 4 of the EA.

Comment No and Commenter	Comment Summary	Category of Comment	Responses
2 Commenter 2	Disagreement that EVs would use less fossil fuels and have lower emissions than ICE vehicles	6	As provided in Section 3.10.2, LPO calculated the amount of CO2e avoided annually from the Project's annual fuel consumption savings associated from the sale and use of 100,000 EVs (i.e., 60.9 million gallons) multiplied by the U.S. Energy Information Administration's fuel emission factor of 19.54 pounds of CO2e per gallon for gasoline. Therefore, the use of Rivian EVs produced by the Project would support the avoidance of approximately 595,000 tons of CO2e per year for every 100,000 EVs sold (U.S. Environmental Protection Agency, 2023). No changes have been made to DOE/EA-2251.
3 Commenter 2	Applicant would not be able to pay off loan	6	The LPO's NEPA process informs the decision as to whether to issue a loan, and the NEPA review does not encompass or opine on an Applicant's financial capabilities; therefore, this comment is outside the scope of LPO's NEPA review. No changes have been made to DOE/EA-2251
4 Commenter 2	The draft EA does not reflect accurate payment in lieu of taxes (PILOT) and non-local workers will put strain on public services. JDA distribution of PILOT does not fairly allocate PILOT payments to the county.	4	<p>As provided in Section 3.7.1 of the EA, the review states: "For Phase 1, Rivian projects that the facility would provide approximately 7,500 full-time jobs, which would support approximately 8,000 new indirect jobs (GDEcD 2022 and 2023a). Rivian estimates that the average annual salary would be approximately \$56,000, which would be slightly less than local median household income in the four-county region (\$71,692 in Walton County, \$64,767 in Newton County, \$71,000 in Morgan County, and \$57,424 in Jasper County [U.S. Census Bureau 2020]) but exceed the local median income for non-family households (\$39,715 in Walton County, \$46,296 in Newton County, \$35,597 in Morgan County, and \$31,026 in Jasper County [U.S. Census Bureau 2020])." The section states: "Collectively, the Project is expected to generate more than \$1 billion in labor income annually (Georgia Power 2021). Revenue from taxes and payments in lieu of taxes (PILOT) would amount to an estimated \$900 million over the next 25 years, using conservative estimates. These funds would go to the four surrounding counties as well as the City of Social Circle to support government functions, including police and fire services, roads, parks, and other public services, with 60 percent of the net total tax revenue directed to the school districts within the Project area (GDEcD 2023b)."</p> <p>Since the Applicant has currently committed to a \$5B investment, Phase I, the commenter is partially correct that Rivian will only pay \$309,366,030 in PILOT Payments. The Applicant will also have to pay personal property taxes, estimated at \$289,606,821, over the 25-year period. Should the Applicant invest \$15B in the Project, then they will pay \$908,348,050 in PILOT Payments. However, once again, the Applicant will be required to pay personal property taxes, in addition to, the PILOT Payments.</p> <p><u>Local Distribution of Taxes Paid</u></p> <p>The Joint Development Authority (JDA) is an organization fiduciarily bound to the jurisdictions the JDA represents. The tax distribution is memorialized in Amended and Restated Intergovernmental Contract RE: Revenue Sharing Agreement for Stanton Springs and Stanton Springs North dated November 16, 2021, which is Exhibit A to the PILOT Agreement dated May 25, 2022. Section 3.7.1 of the EA discusses that PILOT should offset any increase in demand for community resources. Northeast Georgia Regional Commission published a Developments of Regional Impact Report that is available for review here: dri3560.projectadventure.morgancounty.finalreport.pdf. The Northeast Georgia Regional Commission outlines areas that they recommend municipalities allocate funds to for the project. No changes have been made to DOE/EA-2251.</p>

Comment No and Commenter	Comment Summary	Category of Comment	Responses
5 Commenter 2	Concern over project's dust control during construction	5	EA section 3.4 evaluates the potential air quality impacts, which included a review of dust emissions and monitoring, which includes that portable air monitoring equipment would be used for dust monitoring during days with earthmoving and site grading operations. Dust monitoring would be performed in accordance with EPA Community Air Monitoring Program (CAMP) guidelines and defined applicable dust thresholds and minimization measures. No changes have been made to DOE/EA-2251.
6 Commenter 2	The EA by USACE did not account for groundwater recharge and effects on local wells. Concern over having industrial facility over groundwater recharge area and current construction is impacting water quality. USACE EA references an incorrect number of wells in the area	1	<p>Groundwater, wells, and stormwater were reviewed in the USACE's Environmental Assessment and Finding of No Significant Impact Memorandum of Record for permit SAS- 2020-00182. The USACE considered cumulative effects in Section 9 of the USACE EA. Additional responses to j.1 and l.1 in Appendix A consider the potential effects on groundwater quality and quantity beyond the project limits and regulatory compliance of the Project through construction and into operations. LPO reviewed the USACE EA on water supply and concurs with the findings that water supply is typically managed at the local or regional scale, and the Georgia Environmental Protection Division is responsible for oversight and approvals of new water withdrawals applications, and that the Applicant's due diligence has identified that existing available water supplies are sufficient to accommodate the proposed Project.</p> <p>In accordance with permit SAS- 2020-00182,[permit monitoring], the state of Georgia requires Georgia's Environmental Protection Division (EPD) to conduct monthly inspections of the site as part of the site's construction stormwater permit and it has confirmed that the Project is in compliance with federal and state requirements including but not limited to the General NPDES Permit No. GAR100003 and that stormwater management complies with the Georgia Stormwater Management Manual.</p> <p>The Applicant has confirmed impervious surface will not exceed 50% of the project site, as outlined in the Economic Development Agreement. Section 2.2.4, Material and Waste Management, provides a review of solid and liquid waste management practices and requirements that Rivian will implement during Project operations that are protective of the groundwater resources in the Project area.</p> <p>No changes have been made to DOE/EA-2251.</p>
7 Commenter 2	The Draft EA indicates an inflated average annual salary	5	EA section 3.2.1 Socioeconomics evaluated the average annual salary for jobs at the project. The average salary was calculated based on a comprehensive analysis of current competitive market trends, industry standards, geographic location, and job function Rivian estimates that the average annual salary would be approximately \$56,000, which would be slightly less than local median household income in the four-county region (\$71,692 in Walton County, \$64,767 in Newton County, \$71,000 in Morgan County, and \$57,424 in Jasper County [U.S. Census Bureau 2020]) but exceed the local median income for non-family households (\$39,715 in Walton County, \$46,296 in Newton County, \$35,597 in Morgan County, and \$31,026 in Jasper County [U.S. Census Bureau 2020])." No changes have been made to DOE/EA-2251.

Comment No and Commenter	Comment Summary	Category of Comment	Responses
8 Commenter 2	Concern over local air quality due to Project presence.	5	EA section 3.4 evaluates the potential air quality impacts due to the project and concluded they would not be significant. Air Quality Standards of the Clean Air Act and Georgia Environmental Protection Division (EPD) air toxics program are protective of human health. Through review of the Rivian's permit application, Georgia EPD confirmed that the Project would meet the federal and state standards. Additionally, the project that is the subject of the proposed LPO loan is for component and vehicle assembly and does not include a lithium-ion battery manufacturing and, therefore the scope of the review does not encompass lithium-ion battery manufacturing. No changes have been made to DOE/EA-2251.
9 Commenter 2	Applicant has not disclosed that a lithium-ion battery manufacturing facility is a part of the project.	2	See comment response 8, the Project that is the subject of the proposed LPO loan does not include construction of a cell/lithium battery manufacturing facility, The Project that is the subject of the proposed LPO loan includes the construction of a battery pack final assembly facility. Cell manufacturing and battery pack assembly are two different and distinct processes. Final assembly will consist of combining premanufactured lithium-ion batteries into full pack formats for electric vehicle manufacturing. No changes have been made to DOE/EA-2251.
10 Commenter 2	USACE 404 Permit expires December 2027 and project schedule is not complete until 2028.	5	The USACE reviewed and issued a 404 permit for impacts to wetlands and waterways of the United States, and the scope of the Project that is covered by the USACE 404 permit will be complete prior to the expiration date. Should the development of the Project that is covered by the USACE 404 permit encounter delays, GDEC will need to apply for an extension. No changes have been made to DOE/EA-2251
11 Commenter 2	Concern over light impacts for the Georgia State University Observatory.	5	Light pollution was reviewed in the USACE's Environmental Assessment and Finding of No Significant Impact Memorandum of Record for permit SAS- 2020-00182, and (ssn_all_report_usace_environmental_assessment.pdf), and in Appendix 1, which provides that on-site lighting for parking fields will follow dark sky principles to reduce light pollution, downlighting will be prioritized, and that additional lighting will be provided throughout the campus on roads, paths, and around buildings for security and safety and will follow Dark Sky principles. No changes have been made to DOE/EA-2251.
12 Commenter 2	The draft EA does not include any potential impacts of an off-site warehouse.	5	The Project that is the subject of the proposed LPO loan does not include an off-site warehouse. As such, the impacts of an off-site warehouse were not evaluated as part of DOE/EA-2251.
13 Commenter 2	Concern on whether Darel Drive was included in noise analysis	5	EA Section 3.5 Noise included Darel Drive as part of the noise analysis. Specifically, NSA1 in Figure 5 is shown to be along Darel Road. That area is included in the results of the noise evaluation that found the noise levels would be at or below the EPA protective guidelines and in most cases below ambient noise levels. Therefore, no significant noise impacts are anticipated from construction or operation of the Project. No changes have been made to DOE/EA-2251.

Comment No and Commenter	Comment Summary	Category of Comment	Responses
14 Commenter 2	The draft EA does not include Camp Twin Lakes in the cumulative impacts section	5	<p>EA Section 3.10 Cumulative Impacts consider the potential effects on the environment from the incremental impact of the Project when added to other past, present, and reasonably foreseeable future actions. Camp Twin Lakes would not contribute to the cumulative impacts of the proposed project and therefore was not required in this analysis. In addition, the City of Social Circle, GA has developed a Comprehensive Plan in coordination with the Northeast Georgia Regional Commission, as adopted on June 21, 2021, that specifically states on Page 13 “<i>Walton County participates in the Joint Development Authority of Jasper, Morgan, Newton, and Walton Counties. The Joint Development Authority has focused on creating an industrial area for the region, which has resulted in the Stanton Springs Business Park and East Atlanta Megasite. This area is intended to attract National and Global industry for the continued improvement of the local employment market and is partially located within Social Circle city limits. Stanton Springs Park is currently home to Baxalta (a bio-manufacturing facility), the State of Georgia BioScience Training Center, and a Facebook data center. Additionally, a new electric automobile manufacturing facility is expected to open there in 2024, bringing an estimated 7,500 new jobs to the area. These developments bring tremendous employment opportunity to Social Circle residents and will attract new residents to the area.</i>” Refer to the Comprehensive Plan here: (https://www.socialcirclega.gov/home/showpublisheddocument/664/638155172975330000)</p> <p>As evidenced by the excerpt above, the EV manufacturing facility was considered by the City of Social Circle in the development of its Comprehensive Plan and the impacts that the Stanton Springs North business park would have on the region.</p>
15 Commenter 2	The GDOT study is not representative of the impacts of the project. Construction traffic has been using local and smaller roadways.	5	<p>Section 3.6 Transportation evaluated the potential impacts of the project on traffic and concluded it is not significant. The state has upgraded local roads to accommodate additional vehicles including a recently completed Frontage Road with the I-20 exchange improvements in progress that will be utilized for traffic entering the site by the start of substantial construction, by the Applicant. Substantially reducing Project related construction traffic in the surrounding areas. These GDOT projects can be reviewed https://us278andoldmillroad-gdot.hub.arcgis.com/. A study of the traffic impacts and mitigation measures is also available on the Stanton Springs website (ssn_site_report_july_2023_jacobs_traffic_engineering_report.pdf)</p>

Comment No and Commenter	Comment Summary	Category of Comment	Responses
16 Commenter 2	Disagreement with the term 'community' when referring to Stanton Springs. Commentor points out in Section 1.3.2, that the Stanton Springs North development is within the communities of Rutledge and Social Circle.	6	DOE/EA-2251, Section 1.3.2 has been appropriately revised to "The Project site is 40 miles east of Atlanta in the business park development of Stanton Springs North".
17 Commenter 2	Project is not consistent with allowed zoning MDX1 because of the wastewater treatment plant and storage of hazardous materials.	3	<p>Section 2.5(b) of the EDA provides that the Project is exempt from local zoning ordinances as a result of the State's ultimate ownership of the Project site. This exemption has been confirmed by the Superior Court of Morgan County: "[T]he Morgan County land use codes, ordinances, or regulations cannot be enforced against the Rivian Project property" (Edward Clay et al. v Morgan County, Georgia et al, No. 2023-SU-CA-027 (January 2, 2024)). Thus, Rivian is not required to comply with the MXD1 zoning requirements. However, Rivian agreed to comply with the zoning and land use regulations for the Stanton Springs Business Park (SSBP) to the extent such regulations are attached as Exhibit L to the EDA.</p> <p>Within the SSBP Zoning Requirements, the following are listed:</p> <p>E. Prohibited Uses</p> <p>i. The following uses are prohibited:</p> <p>w. Privately operated sanitary landfill, sewage or treatment plant (excluding onsite pretreatment facilities)</p> <p>Within the draft EA, the wastewater treatment plant is a facility process dedicated to treatment of industrial wastewater prior to discharge to the POTW. Therefore, the Applicant's onsite wastewater treatment system qualifies as a pretreatment system. Onsite pretreatment facilities are an allowed use according to the cited zoning regulation.</p> <p>Manufacturing is also included in the Tier 1 Use Table for SSBP as a permitted use. Industrial use is permitted if it's an accessory to the permitted use like manufacturing. Additionally, SSBP does not allow for facilities that generate noxious dust, odor, air pollution, water pollution, and noise. LPO evaluated the project impacts in EA Sections 3.4 (dust odor, air pollution), 3.3, and 3.5 and are not expected to be significant. Furthermore, the project has received confirmation from Walton County that the project is allowed under SSBP pursuant to the letter dated April 20, 2022 and attached as (Exhibit N of Economic Development Agreement jda-rivian -- economic development agreement- fully executed 5.2.22.pdf).</p>
18 Commenter 2	Applicant has not provided mitigation and disposal plans for wastes generated during manufacturing.	5	As a requirement of a DOE loan guarantee, the project site is being developed in compliance with all applicable environmental laws and regulations. Sections 3.8 and 3.9 of the draft EA evaluated these items and found them to be insignificant. Mitigation and disposal plans are best developed closer to start of operations of a facility when design, material amounts, and products are finalized. The applicant has developed mitigation and disposal plans in compliance with federal, state, and local requirements for their manufacturing facility in Normal, IL and intend to comply with all applicable requirements for their proposed site at Stanton Spring North.

Comment No and Commenter	Comment Summary	Category of Comment	Responses
19 Commenter 2	There is a court case to determine whether the claim by the state that the site is exempt from local zoning is valid.	6	The LPO's NEPA process informs the decision as to whether to issue a loan guarantee, and the NEPA review does not encompass pending court decisions; therefore, this comment is outside the scope of LPO's NEPA review. LPO notes that the most recent decision by the Georgia Court Appeals for the court case that is the subject of the comment was adjudicated in favor of the State and Rivian and can be found here: https://casetext.com/case/clay-v-morgan-cnty , and that the case is currently with the Georgia Supreme Court for review.
20 Commenter 2	Comment on the characterization of surrounding properties within the DOE/EA-2251	6	Surrounding area characterizations were made using various comprehensive county planning documents including the Walton Co. Comprehensive Plan Update (2022), the 2017-2036 Morgan County Comprehensive Plan and the Social Circle Comprehensive Plan (2022). As well as, the Phase I Environmental Site Assessment, Cultural Resources report and multiple site visits. As such, no changes have been made to DOE/EA-2251.
21 Commenter 2	Project does not reflect the Comprehensive Land Use Plan and Regional Plan	3	The project is consistent with SSBP zoning requirements attached as Exhibit L to the EDA. Furthermore, the project has received confirmation from Walton County that the project is allowed under SSBP pursuant to the letter dated April 20, 2022, attached as Exhibit N to the EDA. As such, no changes have been made to DOE/EA-2251.
22 Commenter 2	Comment on residential zoning requirements	3	Residential zoning requirements for the project area are decided by local and state officials and documented in County development plans such as the Social Circle 2022, Comprehensive Development Plan. Therefore, this comment is outside of the LPO project scope, and it will not be evaluated as part of this review.
23 Commenter 2	Applicant's other facility in Normal, IL has had numerous fire department calls and a fire this past summer. Plans have not been able to prevent polluting fires at other facility	6	As provided in Sections 2.2.4 Material and Waste Management and 3.8 Health and Safety, Rivian will develop site specific Environmental, Health and Safety plans to adhere to all local, state, federal regulations and as required by the DOE loan guarantee. In doing so, these operations will not have a significant impact as noted in DOE/EA-2251. As such, no changes have been made to DOE/EA-2251.