

# Coastal Communities United

March 3, 2025

Commander Ronald J. Sturgeon  
U.S. Army Corps of Engineers (USACE)  
Savannah District, Coastal Branch  
Attention: Mrs. Sarah Wise, Lead Biologist  
100 West Oglethorpe Avenue, Savannah, Georgia 31401  
**Permit Number: SAS-2015-00235**  
**Project Number: SAS-2015-00406**  
sarah.e.wise@usace.army.mil

**Subject: Re-Evaluation of Water Demands and Cumulative Impacts for Bryan County Mega Site**

Dear Commander Sturgeon,

We, Coastal Communities United (CCU), are writing to you to provide notice of grave community concerns regarding the timeline of permitting and reevaluation of the Clean Water Act (CWA) § 404 permit application and associated environmental impacts analysis prepared to conform with the National Environmental Policy Act (NEPA) for the Bryan Mega Site, File Number SAS- 2015-00235. It has been six months since your office requested additional information from the permittee. In that time, there has been no update to the public and no corrected public notice, despite the change in application data absolutely affecting the public's view of the proposal, as evidenced in attendance and comments at meetings held by the Georgia Environmental Protection Division (GA EPD) for the groundwater withdrawal permits to support the Mega Site.

## **Background:**

It is important to note that CCU has obtained hundreds of documents from requests associated with the Georgia Open Records Act (GORA) and the federal Freedom of Information Act (FOIA). Reviews and analyses of local, state, and federal documents, permit applications, and engineering and scientific studies, have facilitated CCU in developing a critical timeline of misinformation in the § 404 permit application process and apparent inadequacy in the state groundwater modeling. Conclusions regarding some of the countless gross inadequacies of the groundwater modeling that was used by the GA EPD, in the state's evaluation of the impacts of the 7 MILLION GALLONS PER DAY (MGD), averaged monthly, of ground water to be withdrawn from four new wells constructed into the Florida aquifer in Bulloch County, a county where the proposed Bryan County Mega Site is not even located, have been described in public comments for that project.

Those conclusions include comments from a scientific expert in adverse environmental impacts from unsustainable groundwater withdrawals from the Floridan aquifer throughout the extent of the regional, karst Floridan aquifer system. Examples of those conclusions are provided in comment letters that are included as Attachments A1, A2, and A3. All of the supporting documents, referenced as attachments in

those comment letters, were provided to you previously. Therefore, the attachments associated with those comment letters are not being resubmitted to you with this comment letter.

Extensive criticism by scientific experts has not been restricted to the 2010 groundwater model that GA EPD has been using to evaluate groundwater withdrawal applications within the extent of the regional Floridan aquifer system in Georgia and consistently used to issue permits for those applications. Extensive criticism by scientific experts also has been made regarding groundwater models that consultants have used to predict groundwater and/or surface water responses for applicants requesting groundwater withdrawal permits from GA EPD, which GA EPD readily accepted as valid model results. One of the most recent examples of those criticisms was from Dr. Rhett Jackson, the John Porter Stevens Distinguished Professor of Water Resources at the University of Georgia (UGA). Examples of Dr. Jackson's criticisms are provided on pages 9-11 of Attachment A3. It is important to note that the consultant's groundwater model results that Dr. Jackson was evaluating were restricted to results related to the proposed dewatering of proposed mining pits, not the results of the additional proposed groundwater pumping from wells constructed in the Floridan aquifer, which would have been an additional 1+ MGD.

Since those comment letters were prepared and submitted, additional information has revealed that the burden on our already severely depleted groundwater supplies throughout the regional, karst Floridan aquifer system are being threatened further by additional groundwater withdrawals from the Floridan aquifer. The most recent of those additional withdrawals is being proposed by the GA EPD, using that agency's same fatally flawed presumptions and evaluations, while completely ignoring the well-established responses throughout the entire regional, karst Floridan aquifer system to unsustainable groundwater extractions from the Floridan aquifer. A second threat is being proposed as an increase in volume to groundwater extractions from Floridan aquifer wells already permitted by the GA EPD or proposed/pending, as shown in the summary table that CCU created and is included as Attachment B. The GA EPD does not conduct any of the evaluations required under NEPA, all of which should have been conducted by your agency prior to issuing the initial permit for the construction of the Hyundai Mega Site in Bryan County, Georgia.

**Summary of Recently Disclosed Widespread Adverse Impacts from the Bryan County Mega Site Not Considered by USACE or Open for Public Comments Prior to the Premature Issuance of the USACE Permit for Construction, in Violation of NEPA:**

According to The Governor's Budget Report for Amended Fiscal Year 2025 and Fiscal Year 2026 (Attachment C), **an \$1.1 billion project is being allocated for water infrastructure projects across the region, with at least \$300 million going to Effingham County to install pumps along the Ebenezer River, moving water across to Bryan County to fulfill water demands for the Mega Site.** The proposal includes trade-off towers for groundwater rights, which further poses a challenge to the sustainable use and allocation of groundwater resources. In the budget highlights for FY2025 (page 7 of the report), it is stated, under Georgia Environmental Finance Authority subheading, that allocations would be made in the amount of "\$501,700,000 for investment in the development and construction of surface water resources for Georgia's Coastal region to meet growth in demand."

**A half billion dollars for “construction of surface water resources for Georgia’s Coastal region to meet growth in demand” represent an unprecedented amount of infrastructure development and construction the region, no doubt related to the unprecedented economic development investment made in the Bryan County Mega Site.**

**Timeline of Permit Misinformation and Suppressed Information:**

- July 1, 2019 – In this undated Memorandum of Record (MOR) as the Environmental Assessment/Finding of No Significant Impact (EA/FONSI), with the final signature dated July 1, 2019, the USACE concludes it would be reasonable to assume that the Bryan County (water) supply is adequate to meet the need of the proposed project (previously proposed gas-powered auto manufacturing facility) (Attachment D1, which is more than 49 MB in size, too large to email, but is incorporated into the file of record by reference).
- April 25, 2022– Georgia Department of Economic Development and Savannah Harbor Interstate Corridor Joint Development Authority (JDA) sends a “letter of intent” regarding the Hyundai project proposing “construction of 4 new groundwater supply wells” along with transmission mains to serve the proposed Hyundai electric-vehicle manufacturing site in Bryan County (Attachment D2).
- June 7, 2022– The JDA submits a § 404 permit application to your office for the Mega Site (Attachment D3). The application does not include details about water or infrastructure, although water and electric infrastructure are not available at the site.
- Oct. 4, 2022 – USACE issues a FONSI as a result of the EA related to the federal § 404 permit application submitted by the JDA for the Bryan Mega Site EV manufacturing facility (Attachment D5, which is more than 48 MB in size, too large to email, but is incorporated into the file of record by reference). USACE concludes that the plant will have a “negligible effect” on nearby “municipal and private water supplies” and that “it would be reasonable to assume that the Bryan County (water) supply is adequate to meet the need of the proposed project.” The assessment makes no mention of the four proposed wells or previously documented concerns regarding saltwater contamination of the aquifer.
- November 14, 2022– GA EPD creates “Weekly Notes” to “Rick” that CCU obtained on November 4, 2024 (**two years after the creation of those notes**), in response to a GORA request submitted to GA EPD – those notes included the following information, verbatim (**quoted from that document**), listing the approximate magnitude of drawdowns that the 4 proposed new wells to be constructed into the Floridan aquifer in Bulloch County would result in for the following public water supply wells (Attachment D4):

“Bryan/Bulloch County well locations – impacts on other PWSs, increased drawdown;  
“unreasonable adverse effects”

o **Bulloch County**

GA0310278 Chatham Place: **~28 feet of drawdown**

GA0310166 Eldorado Farms Subdivision (WUM): **~41 feet of drawdown**

GA0310188 Olney Station Subdivision (WUM): **~32 feet of drawdown**

o **Bryan County**

GA0290099 Hayden Lakes Subdivision (Abbott): **~14 feet of drawdown**

GA0290006 Bryan Woods Estates (WUM): **~12 feet of drawdown**

GA0290023 Bryan Woods Estates Phase III: **~10 feet of drawdown?"**

- Feb. 26, 2024 – GA EPD estimates that the four proposed wells, if drawing a maximum of 7 MGD, average monthly, groundwater to serve the Mega Site industry and associated supporting structures, would lead to a “drawdown” of as much as 19 feet in the Floridan aquifer, resulting in a 12-foot drawdown for private groundwater wells serving nearby farms and a 15-foot drawdown for residential wells (Attachment D6).
- June 3, 2024 – Ogeechee Riverkeeper (ORK) files a “Notice of Intent to Sue for Violations of the Clean Water Act, National Environmental Policy Act, and Administrative Procedure Act” to USACE regarding the Bryan County Mega Site (Attachment D7).
- August 23, 2024 – USACE provides a letter to ORK (Attachment D8) and to the JDA (Attachment D9) stating that “Based on the release of the Georgia EPD draft permits, the Corps has determined that new information has surfaced regarding the effects the project may have on municipal and private water supplies, and that reevaluation of our permit decision regarding our effects determination for water supply is warranted.”
- October 7, 2024 – GA EPD issues final permits to Bulloch County (Attachment D10) and Bryan County (Attachment D11), for a total of four new groundwater withdrawal wells for 7 MGD, monthly average, all located in Bulloch County, to support water demands of the Bryan County Mega Site and related development.
- December 23, 2024 – GA EPD responds to a CCU GORA request that “Georgia EPD did not require credentials for people from Bryan and Bulloch counties who will manage the mitigation funds” to compensate residents for the loss and/or contamination of the only source of well water in both of those counties, due to the 4 new Bulloch County wells (Attachment D12).
- January 10, 2025 – Bryan County responds to a CCU GORA request that “No records regarding credentials of the Groundwater Sustainability Program Advisory Committee exist” for the “mitigation fund” to compensate residents for the loss or contamination of their only source of water, due to the 4 new Bulloch County wells (Attachment D13)
- Undated – “Governor’s Budget Report for Amended Fiscal Year 2025 and Fiscal Year 2026” - an \$1.1 billion project is being allocated for water infrastructure projects across the region, with at least \$300 million going to Effingham County to install pumps along the Ebenezer River, moving water across to Bryan County to fulfill water demands for the Mega Site. The proposal includes trade-off towers for groundwater rights, which further poses a challenge to the sustainable use and allocation of groundwater resources. In the budget highlights for FY2025 (page 7 of the report), it is stated, under Georgia Environmental Finance Authority subheading, that allocations would be made in the amount of

“\$501,700,000 for investment in the development and construction of surface water resources for Georgia’s Coastal region to meet growth in demand.” (Attachment C)

Groundwater demands for the Bryan Mega Site were expressed in publicly available information, such as the LOI to Hyundai dated April 25, 2022, prior to USACE concluding its environmental impacts analysis in the October 2022 EA/FONSI. In the § 404 permit application submitted by the JDA, it is stated on page 8 that “This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).” This was misleading at best, as the water utilities required not only extension of transmission lines, but also two new permits for a total of four new groundwater withdrawal wells that were not issued until October of 2024, two years after USACE issued its EA/FONSI, clearly intentionally circumventing the NEPA review process for all of the new wells and the newly proposed utility service connections.

The “description of the proposed action” in the USACE EA/FONSI and initial §404 permit issued by the USACE for the Bryan Mega Site is substantially different – with substantially different adverse impacts - than first presented to the public for review and comment. For a sense of the magnitude associated solely with the proposed new groundwater withdrawals from those four new wells, **the proposed Bryan Mega Site is 7.0 MGD monthly average**. According to the data provided in the GA EPD spreadsheet titled “[Non-Farm] Ground Water Withdrawal Permit List Dec 2024” and incorporated into this comment letter as Attachment E, that volume is more than twice the permitted volume of 3.0 MGD yearly average for the water supply of the entire City of Kingsland, Georgia. According to the data provided in the GA EPD spreadsheet titled “Active Permitted Drinking Water System List Dec2023 Update” and incorporated into this comment letter as Attachment F, the population of the City of Kingsland in 2023 was 22,448. Therefore, that **7.0 MGD permitted groundwater withdrawals for the four new Bryan Mega Site wells is the equivalent water impact of adding a new city of approximately 45,000 people** – instantaneously - to rural Bulloch County. Despite those facts, neither the USACE nor GA EPD considered all of the adverse impacts, including the cumulative impacts, of these withdrawals on the Floridan aquifer, federally listed species, or any aspect of the human environment that will occur throughout Georgia’s coastal counties.

We have not been able to obtain a copy of any additional information related to groundwater analyses and impacts the JDA may have submitted since the USACE notified the applicants in August 2024 that the permit for the Bryan Mega Site was being re-evaluated. If JDA is relying on the groundwater model analyses conducted by the GA EPD, that analysis already has been determined to be grossly inaccurate and fatally flawed. If the JDA is relying on a different groundwater model analysis, those documents need to be made available to the public without further delay.

It would be redundant to enumerate the errors in implementation of the CWA outlined in “ORK’s “Notice of Intent to Sue for Violations of the Clean Water Act, National Environmental Policy Act, and Administrative Procedure Act.” Consistent with CCU’S mission and the magnitude of the changes, misinformation, and suppressed information related to the Bryan County Mega Site from what was proposed originally, we are requesting that the USACE focus on the following five key issues:

1. **Significant Groundwater Withdrawals and need for Environmental Impact Statement**
2. **Flaws in the State's Antiquated Groundwater Modeling that Require USACE to Require More Current and Accurate Approaches of Assessing Groundwater Impacts from the Proposed Project**
3. **Cumulative Impacts Analysis**
4. **Regulatory Guidance for USACE Processing Department of Army Permits**
5. **Public Review and Comment Required for Updated Project Information**

Due to the issues stated above and detailed below, CCU emphasizes the need for a comprehensive re-evaluation of both water demands for the site, impacts from the new infrastructure needed to provide the expansion of water utilities to the site, and impacts on already severely impaired groundwater availability throughout coastal Georgia and all other environmental resource categories from related projects, carrying out a meaningful cumulative impacts analysis in compliance with NEPA. Our concerns are grounded in the following key points:

### 1. **Groundwater Withdrawals and Requirement for Environmental Impact Statement**

- a) The EA USACE prepared did not account for the new 7 MGD average monthly groundwater demanded from Bulloch County to accommodate the Bryan Mega Site. Given the recent permits issued by the GA EPD, the impact of these withdrawals will be significant, affecting residential and agricultural wells in Bulloch County.
- b) The state analysis modeled impacts that required a mitigation fund as a special condition of the groundwater withdrawal permits. This determination is not consistent with "no significant impact" as concluded by USACE in the EA and FONSI dated October 4, 2022.
- c) Absent a significance threshold for groundwater withdrawal being outlined by USACE, another Department of Defense (DOD) NEPA example can be referenced, whereby the Air National Guard clearly outlined in a Draft EA for "Implementing the Installation Development Plan at Abraham Lincoln Capital Airport Air National Guard Base Springfield, Illinois" dated June 2022 (Attachment G) which states in section 3.3.3, "Environmental Consequences Significance Criteria" that (emphasis added),
  - i. "Effects on water resources would be considered significant if the proposed activities would (1) **reduce water availability or supply**, (2) exceed safe annual yield of water supplies, (3) **adversely affect water quality**, (4) threaten or damage hydrology, or (5) **violate water resources laws or regulations**" and
  - ii. The same Draft EA outlines in section 3.6.3 that "Impacts on utilities infrastructure would be considered significant if the Proposed Action increased demand on utilities so that systems were unable to keep up with the demand."
- d) With a significant impact identified, an EA is no longer the appropriate level of NEPA analysis, and an Environmental Impact Statement (EIS) is warranted.

**CONCLUSIONS:** The proposed action for the additional 7 MGD, average monthly groundwater withdrawals associated with the Bryan Mega Site and related development, which have been shown to, at a minimum, “reduce water availability or supply,” constitutes a significant impact to water resources and harm to all of the associated coastal communities within the regional Floridan aquifer system. Additionally, the need for groundwater wells and their transmissions lines, along with other utility requirements for the site, constitutes a significant impact to the human environment.

**2. Fatal Flaws in State Groundwater Model Assessments for The Four New Bulloch County Wells Pumping 7 MGD, Monthly Average, and for Other Permitted Withdrawals Since Approximately 2010:**

- a) Through GORA requests, it has been revealed that the state groundwater modeling for coastal Georgia is based on a 2010 groundwater modeling analysis regarding saltwater intrusion impacts on Hilton Head Island. This study is also a draft document, with the state confirming there was no final copy of that groundwater modeling analysis. Additionally, that fatally flawed groundwater modeling analysis was designed only to assess the impacts of individual, proposed groundwater withdrawals on saltwater intrusion at Hilton Head. Therefore, the state groundwater modeling analysis is singular-focused, meaning it does not meet the requirement for NEPA’s cumulative impacts analysis, and it is based on a draft document.
- b) GA EPD presumably has been using that fatally flawed groundwater modeling analysis - designed only to assess the impacts on saltwater intrusion at Hilton Head - on applications to GA EPD and permits issued by GA EPD for groundwater withdrawals from the regional Floridan aquifer system in Georgia since 2010 – resulting in no valid assessment of any of the cumulative adverse impacts of any of those permits.

**3. Cumulative Impacts:**

- a) The EA resulted in a FONSI based on the incomplete and misleading information provided by the JDA. As described in this letter, that information did not provide an accurate, true requirement of the water and infrastructure demands or any of the myriad adverse impacts of those demands to the human environment.
- b) The groundwater permits issued by GA EPD to authorize 7 MGD, monthly average, of groundwater withdrawals in Bulloch County, to be piped into neighboring Bryan County, were predicted to result in drawdowns of up to 19 feet in the Floridan aquifer and impacting private wells by up to 15 feet, as described in the state’s analysis, despite more severe drawdowns identified by GA EPD on November 14, 2022. These impacts, though significant, still do not account for related and cumulative impacts of other groundwater demands emerging in the region.
- c) Other groundwater withdrawal permit applications currently under review should be considered, including Plug Power in Camden County for 1.1 MGD and two more large withdrawals that can be identified as needing to be included in the impacts analysis, as shown in Attachment B.

- i) The Plug Power project produces hydrogen power, which is the stated fuel source for work on the Mega Site and the Port of Savannah.
  - ii) Another hydrogen power facility was recently announced in nearby Pooler, that will likely draw from a municipal water supply, potentially a combination of surface and groundwater.
- d) According to The Governor's Budget Report for Amended Fiscal Year 2025 and Fiscal Year 2026 (Attachment C), **a total of a half billion dollars will be allocated for “construction of surface water resources for Georgia’s Coastal region to meet growth in demand.”** Surely this substantial resource allocation, which represents an unprecedented amount of construction and land disturbance, among other impacts, is connected to the development of the Bryan County Mega Site.
  - e) **Without the Bryan County Mega Site project, the additional 7 MGD, monthly average, groundwater withdrawals to meet initial demand, surface water infrastructure to provide an alternate source 15 years in the future, the hydrogen power facilities and related water demands would not exist.** Reasonably foreseeable additional, cumulative impacts include the infrastructure and new construction related to these supporting industries. **CCU urges USACE to consider all these types of related and cumulative impacts in an EIS.**

#### **4. Regulatory Guidance for USACE Processing Department of Army Permits**

- a) Pursuant to 33 CFR Part 325 —PROCESSING OF DEPARTMENT OF THE ARMY PERMITS, § 325.2 (d) (5), “(5) The applicant will be given a reasonable time, not to exceed 30 days, to respond to requests of the district engineer.”
- b) Pursuant to § 325.2(a)(2), “Within 15 days of receipt of an application the district engineer will either determine that the application is complete. . . or that it is incomplete and notify the applicant of the information necessary for a complete application. The district engineer will issue a supplemental, revised, or corrected public notice if in his view there is a change in the application data that would affect the public's review of the proposal.

**CURRENT STATUS: It has been six months since USACE requested additional information from the JDA. In that time, there has been no update to the public and no corrected public notice, despite the change in the magnitude of adverse impacts from the changes in the scope of this proposed project from the original project application. All of those changes have resulted in significant impacts to Georgia’s residents and negative public comments regarding this proposed Bryan Mega Site project and all of the associated impacts, as evidenced in attendance and comments at GA EPD meetings for the groundwater withdrawal permits to support the Mega Site.**

- c) The August 2024 letter from USACE to JDA stated, “the Corps may modify the permit to include special conditions to compensate for these impacts pursuant to 33 CFR 325.7(b).”

Pursuant to 33 CFR 325.7, however, the Corps can require more than just a modification of the permit. There are other options available, to include “**modification, suspension, or revocation of permits.**”

- i) Pursuant to § 325.7(a), “**Significant increases in scope of a permitted activity will be processed as new applications for permits** in accordance with § 325.2 of this part, and not as modifications under this section.”

**CONCLUSION: The change in scope from the 2019 404/EA (gas-powered) to the 2022 404/EA (EV facility) should not have been a permit modification, but an entirely new permit.**

- d) Pursuant to § 325.7(c), “The district engineer may suspend a permit after preparing a written determination and finding that immediate suspension would be in the public interest. . . . Among the factors to be considered are . . . .whether or not circumstances relating to the authorized activity have changed since the permit was issued or extended, . . . . any significant objections to the authorized activity which were not earlier considered.”

**CONCLUSION: Without an updated Joint Public Notice (JPN) and a public review and comment period, USACE does not have an accurate account of the significant objections to the authorized activity, including all of the irate public comments provided at the public meeting that GA EPD held in Brooklet, GA on August 13, 2024, related to the proposed groundwater withdrawals for the Mega Site.**

#### **Comprehensive Environmental Impact Statement (EIS) Required:**

**In consideration of the comments and contents of this letter, we urge the USACE to conduct a comprehensive EIS that includes, but is not limited to, an independent and thorough analysis of all of the direct, indirect and cumulative adverse impacts of the 7 MGD, monthly average, of groundwater withdrawals associated with the Bryan Mega Site, that are not restricted to Bryan and Bulloch Counties, but will occur throughout the entire regional Floridan aquifer in Georgia. Additionally, we request that the USACE incorporate more stringent significance criteria for water resources in all future evaluations. The criteria should include but not be limited to existing reductions in water availability, adverse impacts to federally listed species and the habitat of those species, increased adverse effects on water quality, and violations of water resource laws or regulations.**

We believe that a transparent and rigorous reassessment of the water needs and impacts is imperative to prevent further degradation of our regional water resources and to protect the interests of the local communities and the human environment.

Thank you for your attention to this urgent and critical matter. We look forward to your considered response.

Sincerely,



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Attachments:

- A1 8/19/24 Bacchus comment letter second comment letter re: GA EPD's proposed 4 new wells in Bulloch County for groundwater supply to proposed Hyundai Mega Site
- A2 9/3/24 Bacchus comment letter second, supplemental comment letter with new information re: GA EPD's proposed 4 new wells in Bulloch County for groundwater supply to proposed Hyundai Mega Site
- A3 12/30/24 Bacchus comment letter for proposed expansion of Plug Power facility in Woodbine using water to produce hydrogen fuel
  
- B CCU Table "Recent Industrial Projects and New Developments with Withdrawals from Floridan Aquifer Wells and Undisclosed Sources in Coastal Georgia Counties"
  
- C Final Governor's Budget Report for Amended Fiscal Year 2025 and Fiscal Year 2026

Timeline Attachments:

- D1 undated USACE EA/FONSI, and approval memo, with final signature on July 1, 2019 related to the § 404 permit application submitted by the JDA for the Bryan Mega Site gas-powered auto manufacturing facility (incorporated into the file of record by reference because of the large file size – USACE retains original document in the file of record)
- D2 Georgia Department of Economic Development and Savannah Harbor Interstate Corridor Joint Development Authority (JDA) "letter of intent" regarding the Hyundai project
- D3 JDA § 404 permit application submitted to USACE
- D4 GA EPD's "Weekly Notes" to "Rick" that CCU obtained on November 4, 2024 (two years after the creation of those notes)
- D5 USACE EA, FONSI, and approval memo (2022) related to the § 404 permit application submitted by the JDA for the Bryan Mega Site EV manufacturing facility (incorporated into the file of record by reference because of the large file size – USACE retains original document in the file of record)
- D6 GA EPD estimated the four proposed wells, if drawing a maximum of 7 MGD, average monthly, groundwater to serve the Mega Site industry and associated supporting structures, would lead to a "drawdown" of as much as 19 feet in the Floridan aquifer, resulting in a 12-foot drawdown for private groundwater wells serving nearby farms and a 15-foot drawdown for residential wells
- D7 Ogeechee Riverkeeper's "Notice of Intent to Sue for Violations of the Clean Water Act, National Environmental Policy Act, and Administrative Procedure Act" to USACE regarding the Bryan County Mega Site
- D8 USACE's letter to ORK stating that "Based on the release of the Georgia EPD draft permits, the Corps has determined that new information has surfaced regarding the effects the project may have on municipal and private water supplies, and that reevaluation of our permit decision regarding our effects determination for water supply is warranted."
- D9 USACE's letter to JDA stating that "Based on the release of the Georgia EPD draft permits, the Corps has determined that new information has surfaced regarding the effects the project may have on municipal and private water supplies, and that reevaluation of our permit decision regarding our effects determination for water supply is warranted."

- D10 GA EPD issues final permit to Bulloch County for two new groundwater withdrawal wells located in Bulloch County, to support water demands of the Bryan County Mega Site and related development
- D11 GA EPD issues final permit Bryan County for two new groundwater withdrawal wells located in Bulloch County, to support water demands of the Bryan County Mega Site and related development
- D12 GA EPD response to a CCU GORA request that “Georgia EPD did not require credentials for people from Bryan and Bulloch counties who will manage the mitigation funds” to compensate residents for the loss and/or contamination of their only source of water, due to the 4 new Bulloch County wells
- D13 Bryan County response to a CCU GORA request that “No records regarding credentials of the Groundwater Sustainability Program Advisory Committee exist” for the “mitigation fund” to compensate residents for the loss or contamination of their only source of water, due to the 4 new Bulloch County wells
  
- E GA EPD [Non-Farm] Ground Water Withdrawal Permit List Dec 2024
  
- F GA EPD Active Permitted Drinking Water System List Dec2023 Update
  
- G Air National Guard’s Draft EA for “Implementing the Installation Development Plan at Abraham Lincoln Capital Airport Air National Guard Base Springfield, Illinois