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**January 2, 2021**

**VIA E-MAIL**

Central Savannah River Area Regional Commission  
c/o Regina Pyles, Director of Planning  
rpyles@csrarc.ga.gov

**Re: DRI # 3215, Mayfield Natural Resources, LLC**

Dear Ms. Pyles:

Please accept these comments regarding DRI # 3215, the proposed gravel quarry in Hancock County, on behalf of our client Ogeechee Riverkeeper (“ORK”) and concerned citizens of both Hancock and Warren counties who will be directly affected by the proposed quarry due to their proximity to the proposed site. We submit that Mayfield Natural Resources, LLC’s (“MNR”) proposed gravel quarry is not in the best interests of the region.

First and crucially, we find the information provided by MNR to be insufficient to allow for a holistic review of the impact this proposed quarry would have on the region. To elaborate, MNR has performed no traffic studies, blasting analysis, or environmental impact review among other things. It has not analyzed what the potential impacts to the community or region will be. Therefore, the Regional Commission has almost no information on which to base its review.

Regarding economic impact, according to its DRI submittal, MNR estimates the value of the proposed quarry to between \$5,000,000 and \$6,000,000 build-out and estimates the local annual tax revenue at \$7,500,000. See “Additional DRI Information” form. It is not at all clear how MNR arrived at this local annual tax revenue estimate, but it appears to be grossly overstated. In fact, MNR’s attorney stated at a recent planning and zoning meeting that the estimated local tax revenue would only be \$150,000, a fraction of what was stated in the DRI application. MNR has failed to provide any indication of how it arrived at its estimates or to explain the extreme disparity between them. This lack of information precludes the Regional Commission from being capable of adequately analyzing the proposed quarry or from rendering an informed decision about the proposal.

Further, MNR claimed that the quarry will generate between 15 and 25 additional jobs in the community and increase local tax revenue to the county. However, their estimated monetary and employment contentions completely ignore the detrimental impact the quarry will have on nearby property values, including how it would impact the viability of the robust local tourism industry and the many farms and other agricultural businesses. Similarly, MNR's claims fail to consider the cost to maintain and repair local infrastructure or the disproportional burdens and negative impacts nearby marginalized and low-income communities would face. For example, the residential community closest, and adjacent, to the proposed site is Mayfield Properties (MP). MP is a community of 50 low-income families and is home to ~150 individuals. This marginalized community is located directly across the railroad tracks from the proposed quarry. We have not heard anything from the county or the quarry developer about how they plan to protect this community from the disruptive operating activities (blasting, noise, traffic) or the negative environmental and health consequences (silica dust, contaminated well water, etc.) of the quarry's operation. The impacts to this community should be thoroughly explored and addressed before the regional commission can adequately evaluate this project.

Despite MNR's framing, many agricultural and tourism businesses are thriving within a few miles of the proposed site. These include dairy farms, many beef cattle farms, a fish farm, a historic grain mill, a car museum, hunting preserves, a bed and breakfast, and many historical sites, homes, and buildings that attract visitors and play host to weddings and events. These businesses provide tax revenue, jobs, income, and other benefits to the local and regional economy. The proposed quarry would have many and varied negative consequences for these businesses and their owners. These impacts will stunt the growth and future success of these businesses, negating the few jobs offered by the quarry and depressing the local agricultural and tourism economy that have taken root in the area.

Though the existing businesses provide a healthy tax base, any perceived tax revenues from MNR would likely not come to fruition. The additional infrastructure expenses incurred by the County will add additional expenses and reduce property tax revenue due to depressed property values will reduce revenue to the county. It is well documented that quarries reduce quality of life and depress property values from impacts from blasting, heavy trucks damaging infrastructure, and impacts to the environment including wastewater, dewatering, and silica dust, among other things. Thus, the actual revenue for Hancock County would be much less than that estimated by MNR and could actually be a long-term burden for the County and the region. In addition, the many historical sites and homes in the area could be damaged by the quarry's operation. This would not only be a loss for the history and character of this place but would be detrimental to the County's goal of increasing historical tourism — a much more sustainable and beneficial path for regional development than developing quarries, which are short term operations.

Aside from MNR's exaggerated economic projections, we are also certain that the quarry poses a significant threat to the health of the Ogeechee River Basin. ORK's mission is to protect, preserve, and improve the water quality of the Ogeechee River basin. This proposed quarry would pose an everlasting threat to the health of our basin based on its proximity to Fulsome Creek and the Ogeechee River. Additionally, citizens in the area are reliant on

groundwater for drinking. The blasting and operations of quarries contaminate the aquifer and/or lower water levels leaving local wells dry.

Again, the proposed site is home to Fulsome Creek, which feeds directly into the Ogeechee River. This connection to the larger watershed poses a major risk to the health of the basin because of potential downstream contamination, particularly of excess sedimentation. Any breach or simple mistake could lead to contamination affecting not only drinking water, but also the entire downstream Ogeechee watershed and habitat. A quarry of this size in that location poses a very real threat to the health, safety, and environmental wellbeing of the region. Importantly, it is impossible to know the true potential for groundwater contamination without an in-depth, site-specific evaluation. So far, MNR has not provided an adequate evaluation to either the regional commission or to the Hancock County Board of Commissioners. Without complete information, we cannot adequately or accurately analyze the potential regional effects of the proposed quarry.

Similarly, MNR has not adequately addressed their plan to manage dangerous silica dust or prevent increased sedimentation into local surface waters. These types of quarries have a history of struggling to manage both. In fact, Dry Creek, just south of the proposed site, is in the process of being listed impaired by sedimentation by Georgia Environmental Protection Division. A gravel quarry in that watershed is thought to be one of the leading contributors to the impairment. More information can be found here: <https://epd.georgia.gov/watershed-protection-branch/total-maximum-daily-loadings>. This is a real world and local example of how these quarries can negatively impact our environment and water resources. The Ogeechee River is home to many rare and threatened fish, mussels, and other aquatic organisms. Most of their populations are thought to be in poor condition because of increased sedimentation. This proposed quarry only exacerbates the issue. Further, the area of the proposed quarry floods often. When this happens, sediment from the quarry will be washed into the receding waters, leaving layers of silica dust and gravel sediment across the flooded areas. This sediment will work its way into the groundwater, wells, and eventually the creeks and river.

Another concern of ORK is the lack of information on MNR's experience and qualifications in operating gravel quarries. With the threats and concerns outlined above, ORK request that the regional commission require MNR to supply documentation demonstrating that it has the necessary experience and capabilities to responsibly operate a quarry of this magnitude before considering their request.

In sum, ORK finds this proposal extremely troubling, as it will threaten the safety of the watershed, the Ogeechee River Basin, and the citizens of the region. Further, ORK believes MNR has significantly overblown the potential economic benefits of the quarry and has not demonstrated that it has the experience and track record to responsibly operate a quarry

responsibly. Taken together, it becomes clear that the proposed quarry is not in the best interests of the region.

Sincerely yours,

**/s/ Donald D.J. Stack**

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