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[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

July 25, 2024

**Via E-Mail**

Bill Frechette, Unit Manager  
Water Supply Program – Groundwater Withdrawal Unit  
2 Martin Luther King Jr. Dr., S.E. East Floyd Towers, Suite 1052  
Atlanta, Georgia 30334  
[Bill.Frechette@dnr.ga.gov](mailto:Bill.Frechette@dnr.ga.gov)

**Re: Comments on Groundwater Withdrawal Permit Modification – City of Pembroke – Bulloch County Operations; Permit No. 016-0009**

Dear Mr. Frechette:

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 21 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. One of ORK's roles is to ensure the long-term health of the watershed's aquifers, including the Upper Floridan Aquifer, which supports not only residents, but also the aquatic health of the Ogeechee and Canoochee Rivers as well as their tributaries.

ORK offers these comments on the proposed withdrawal permit modifications for the City of Pembroke's Bulloch County Operations. Specifically, ORK asks that the Georgia Environmental Protection Division (EPD) take a harder look at potential ecological impacts from the increased withdrawals. Likewise, EPD should require clearer and updated descriptions of water conservation measures. More generally, ORK calls on the EPD, the Georgia Department of Natural Resources (DNR), the Coastal Georgia Water Planning Council, and municipal, county, and other localities to come together and plan collaboratively for the region's long-term water supply need to be met sustainably.

1. Stronger consideration of potential environmental impacts

The watershed would benefit from a deeper analysis of the potential ecological impacts of the proposed withdrawal increases. Little information is provided by the applicants about potential impacts to other water resources, their associated aquatic and terrestrial habitats, or the fish and wildlife that rely on them. It does not appear that any

environmental impacts were considered beyond assessing drawdown in the Floridan Aquifer. Impacts to other aquifers, surface waters, wetlands, and spring could result from increased groundwater withdrawal. Any potential negative impacts could hurt the public interest and welfare for those who rely on these natural resources. ORK asks that EPD fully consider any potential environmental impacts and address and mitigate resulting harms prior to granting this permit modification.

2. Updated and clarified water conservation and efficiency measures

Water withdrawn from the Floridan Aquifer should be conserved and used as efficiently as possible. ORK appreciates the applicant's creation and inclusion of a Water Conservation Plan as part of its modification application and for EPD's consideration. ORK encourages some increased clarity and updates to the plans, especially in light of incoming residential and industrial growth. Based on Section III of the plan, potential updates to the plumbing ordinance and building codes for the new housing developments, serious consideration of treated wastewater for industrial user, and a clearer process or rubric for selecting conservation measures and improvement to implement would all help to reduce strain on the Floridan Aquifer while maximizing the limited supply available to the City of Pembroke.

3. Need for comprehensive regional water supply planning

ORK continues to call on EPD, other state agencies and entities, and state, county, and local governmental officials to seriously and collectively plan for the region's growing water supply demands. With the growth of the Port of Savannah and the Hyundai Mega-site leading the way, water demand is growing in an already strained aquifer system. Additional population and industrial growth in the region from Statesboro to Hinesville, and including Pembroke, demand for water is growing as Red and Yellow Zone withdrawals are being reduced. As seen with the Hyundai supply wells, the recently proposed Long County wells to supply the City of Hinesville, and this expansion of Pembroke's Bulloch County operations, growing demand in Yellow and Red Zone areas are lining up groundwater wells just over the border in Green Zone areas. Growing demand and this short-sighted solution is setting up serious issues in the region's ability to sustainably meet this growing demand and threatens to expand Yellow and Red Zones if supply continues to come from these Green Zone wells.

Collaborative, long-term water supply planning needs to begin as soon as possible. The region must begin to utilize surface waters to meet existing and growing industrial water supply demand to reduce strain on the Floridan Aquifer. While ORK appreciates the EPD's efforts in requiring new surface water sources to eventually supply the Hyundai mega-site's demand, that demand replacement alone is insufficient to ensure long-term sustainability. State, local, and regional decision-makers and elected officials must prioritize this issue of water supply, begin to bring surface and alternative water supplies online for industrial needs, and reserve Floridan Aquifer water for residential, domestic, and agricultural demand.

Thank you in advance for your time and consideration; please let me know if you have any questions:  
[ben@ogeecheeriverkeeper.org](mailto:ben@ogeecheeriverkeeper.org).

Sincerely,

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper