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Memorandum

To: Bill Frechette, Groundwater Unit, GA EPD

From: Kirk Croasmun, PE, Director of Engineering
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CC: Dr. Ania Truszczynski, Branch Chief, Watershed Protection, GA EPD
Dr. Wei Zeng, Manager, Water Supply Program, GA EPD

Date: April 4, 2025

Reference: **Update on Alternative Water Supply**

In accordance with Special Conditions Item 6)i of the Permits to Use Groundwater Issued to Bryan and Bulloch Counties, Permit No. 016-0013 and Permit No. 016-0014, respectively, the purpose of this memorandum is to provide an update on alternative water supply to serve the Bryan County Industrial Mega-Site and other associated development. This memo includes a summary of progress on the following related topics:

i. Candidates for surface water alternatives

ii. Candidates for other alternative sources of water

iii. Initial prioritization and delineation of these alternative resources in terms of ready deliverability

iv. Initial prioritization of what specific areas will be served by these non-Floridan aquifer groundwater alternative sources

v. Potential goals and milestones for this source water transition

vi. Potential funding mechanisms for planning and implementation efforts for the development and delivery of alternative sources

In addition, this report provides a summary of the projected water demands for northern Bryan County and southeastern Bulloch County for the interim and long-term planning horizons as well as background information on the water infrastructure and capital improvements necessary to transition to a sustainable blended groundwater-surface water system.

Background

In 2014, the Georgia Department of Economic Development and the collective development authorities from the four coastal counties of Bulloch, Bryan, Effingham, and Chatham (now formally the Savannah Harbor-Interstate 16 Corridor Joint Development Authority or JDA) identified the Bryan County Mega-Site as a potential location for a major original equipment manufacturing (OEM) facility. In 2015, Volvo, the first potential OEM that considered the Bryan County Mega-Site, ultimately choose to locate in Berkeley County, South Carolina. Since that time, significant planning for water and sewer infrastructure to serve the Mega-Site and surrounding area has taken place. In 2022, Hyundai announced its decision to locate the Hyundai Motor Group Metaplant America (HMGMA) manufacturing facility and a joint venture with LG Energy Solution (LGES) for a battery manufacturing facility on the I-16 Mega-Site (HL-GA Battery Company, LLC or HL-GA).

Development of the Mega-Site created the opportunity to transform the coastal region of Georgia by creating higher quality jobs, addressing underemployment, recruiting large manufacturing operations, joining with post-secondary education, and creating workforce housing infrastructure. Projections indicate that the impact of this investment has the potential to generate over 10,000-20,000 direct permanent jobs and an additional 30,000-50,000 in-direct permanent jobs over the next 20 years. In addition, Bryan County has already experienced tremendous growth over the past few decades, and according to the 2020 Census, Bryan County was the fastest growing county in Georgia, outside of Metropolitan Atlanta. The 2021 total population of Bryan County was estimated at 49,887. This is a 55% growth in population since 2010 and a 289% growth since 1980. This far exceeds the growth rate for the State of Georgia, which saw an overall average growth of 98% between 1980 and 2021 and just an 11% growth between 2010 and 2021.

Interim Water Demand Projections for Bryan

Prior to 2021, North Bryan County's existing water supply system consisted of a small 450 gallon per minute (GPM) supply well and a 500,000-gallon (0.5 million gallons or MG) elevated water storage tank located within Interstate Centre. Bulloch County currently has no existing public water system in the southeastern portion of the County, with only individual private wells and small private community wells located in the area. Following increasing demands for development within Northern Bryan County, which started in 2021, the County began expanding its water infrastructure to include a new Yellow Zone Floridan aquifer well and second 0.5 MG elevated storage tank along Highway 80. In order to meet the projected water needs of HMGMA, HL-GA, and affiliates, as well as associated development in both counties,

Bryan and Bulloch began cooperative planning efforts to construct new Floridan Aquifer wells in the Green Zone. Interim infrastructure planning called for an increase in water supply and delivery capacity to approximately 6.65 million gallons per day (MGD) to meet the anticipated average daily demands (see Table 1). The required infrastructure improvements needed to facilitate this level of service to North Bryan consisted of four (4) new Green Zone Floridan aquifer wells, one (1) new Yellow Zone Floridan Aquifer well, large diameter water mains, booster pump stations, metering stations, and a 2 MG elevated water tank.

BRYAN WATER DEMANDS - SHORT-TERM					
Service Basin	Average Daily Flow (GPD)	Average Daily Flow (GPM)	Peak Daily Flow (GPM)	Peak Hourly Flow (GPM)	ERU's
North of Interstate 16 Basin	1,020,180	708	1,275	1,913	3,401
South of Interstate 16 Basin	1,629,063	1,131	2,036	3,054	5,430
Bryan County Mega-Site	4,000,000	2,778	6,923	9,967	22,164
TOTAL:	**6,649,244**	**4,618**	**6,923**	**9,967**	**22,164**

Table 1. Short-Term Water Demand Projects for North Bryan County

Future Water Demand Projections for Bryan County

Prior to Hyundai's announcement to locate at the Mega-Site in 2022, Bryan County had already experienced a significant increase in requests for re-zonings and land development plans. As outlined in Bryan's latest Comprehensive Plan and Water/Sewer Master Plan, which were both completed in 2023, North Bryan is expected to have continued demand for increased water supply along with a corresponding expansion of the water delivery system. Table 2 presents the anticipated long-term water demands for the current North Bryan Service Area based on the projected development over a 25-year planning horizon and HMGMA's planned future expansion to facilitate an increase in annual car production from 300,000 to 500,000.

Future Water Demands for Pembroke and Other Portions Unincorporated Bryan County

The demand projections listed above are limited to the anticipated development in the existing service area of northern Bryan County, generally bounded by the Bulloch County line to the north, the Ogeechee River to the east, and Wilma Edwards, Stubbs, Pevey, and Toni Branch Roads to the west and south. In addition to the City of Pembroke, there are approximately 52,000 acres of unincorporated Bryan County that will develop to varying degrees in the future. Most of the unincorporated areas will remain rural, but portions will develop based on the need for housing and other resulting commercial growth associated with HMGMA's economic boon. Pembroke currently operates two Floridan aquifer wells, including one located in the Bulloch County Green Zone. Pembroke's Yellow Zone well has a permitted average daily withdrawal limit of 0.27 MGD on a yearly average and 0.36 MGD on a monthly average basis. Pembroke's Green Zone groundwater use permit

was modified on November 7, 2024 to allow an average daily withdrawal limit of 0.36 MGD on a yearly average and 0.48 MGD on a monthly average basis, giving the City a combined annual average daily capacity of approximately 0.63 MGD.

Much of the unincorporated area will be served in the future by private small community water systems or individual private wells, but Pembroke and other more densely developed portions of the County will require a municipal supply. There is the potential for approximately 2 to 3 MGD of additional water demand between Pembroke and these more densely developed areas.

WATER DEMANDS - LONG-TERM					
Service Basin	Average Daily Flow (GPD)	Average Daily Flow (GPM)	Peak Daily Flow (GPM)	Peak Hourly Flow (GPM)	ERU's
North of Interstate 16 Basin	1,258,370	874	1,573	2,359	4,195
South of Interstate 16 Basin	2,021,842	1,404	2,527	3,791	6,739
Future Service Basin	2,371,747	1,647	2,965	4,447	7,906
Bryan County Mega-Site	6,200,000	4,306	7,750	11,626	20,667
Pembroke Area	3,000,000	2,083	3,749	5,624	10,000
TOTAL:	**14,851,959**	**10,314**	**18,565**	**50,126**	**49,507**

Table 2. Long-Term Water Demand Projects for North Bryan County

In summary, over the next 25-years, Bryan County and the City of Pembroke will need to supply approximately 14.9 million gallons of water to meet the growth and development. A blended groundwater and surface water supply, where approximately 3.69 MGD of Green Zone supply (2 Bulloch owned wells, 2 Bryan owned wells, and 1 Pembroke owned well), 0.27 MGD of Yellow Zone supply (Pembroke's existing well), and approximately 10.94 MGD of surface water supply would satisfy the projected future demands.

Water Demand Projections for Southeastern Bulloch

In June 2023, Bulloch County adopted its "Smart Bulloch Future Development" plan to better manage anticipated growth, which include targeted "Suburban Corridor" development along Highway 46 and the southern end of Highway 80 as well as "Suburban Neighborhood" development in the area generally bounded by Highway 67 to the west, Highway 80 to the east, Lawrence Church Road and Seed Tick Road to the south, and Mud Road to the north. Based on these current planning efforts, Bulloch anticipates short and long-term needs for water in southeastern Bulloch to reach approximately 0.6 and 1.0 MGD, respectively, as summarized in Table 3 below.

SOUTHEAST BULLOCH WATER DEMANDS					
Service Basin	Average Daily Flow (GPD)	Average Daily Flow (GPM)	Peak Daily Flow (GPM)	Peak Hourly Flow (GPM)	ERU's
Short-Term Residential and Commercial Development (0-10 years)	600,000	417	750	1,126	2,000
Long-Term Residential and Commercial Development (10-25 years)	400,000	278	500	1,560	1,333
TOTAL:	**1,000,000**	**659**	**1,250**	**2,686**	**3,333**

Table 3. Water Demand Projects for Southeastern Bryan County

Initial Groundwater Supply Water Supply

As described in Bryan County's Justification of Need report dated March 22, 2023, and revised June 21, 2024, the four Floridan aquifer Green Zone wells authorized under Permit No. 0016-0013 and 0016-0014 were planned by Bryan and Bulloch Counties to provide water for the short-term demands of approximately 6.65 MGD resulting from the industrial development at the Mega-Site and associated surrounding development. Bulloch County intends for its short-term and long-term water needs of approximately 1.0 MGD to be supplied by a combination of the four well authorized under the referenced permits as well as potential future wells to be located further north and west in Bulloch County.

Future Alternative Water Supply Sources

As part of Bryan County's Environmental Review and Planning Document for the Bryan-Bulloch Regional Water Supply and Transmission System, dated October 18, 2022, which was submitted to GA EPD as part the State Environmental Review Process (SERP), Bryan County considered numerous options for alternative initial and future water supply options including, Green Zone wells in Effingham County, surface water supply from the Ogeechee and Savannah Rivers, as well as Miocene and Cretaceous aquifer wells. Many of these alternatives were deemed infeasible due to a combination of high cost of infrastructure, limited supply volumes, and environmental impacts associated with withdrawals. As part of the Environmental Review and Planning Document three alternatives were explored in more detail, including Green Zone wells in Effingham County, Bulloch County and the purchase of Savannah River surface water from the City of Savannah.

As described in correspondence to Ania Truszczynski of the Georgia Department of Natural Resources Environmental Protection Division (GA EPD) on September 1, 2022, Bryan County has long stated its commitment to work with the department and surrounding local partners to mitigate potential long-term effects of coastal saltwater intrusion into the Floridan aquifer by identifying and pursuing the extension of surface water into northern Bryan County. Bryan has explored several

alternative long-term water supply options, but the most feasible and cost-effective option is the extension of a large diameter transmission main along Interstate 16, which will connect to surface water supplied collectively by the City of Savannah (COS) and Effingham County (EC). In fact, in the initial stages of route planning and infrastructure corridor design considerations for the Interstate 16 wastewater force main, which is integral to both of Bryan County's regional sewer intergovernmental agreements (IGA) with EC and COS, BC obtained easements rights to allow for this future water transmission main.

To date, the purchase of Savannah River surface water from neighboring COS and EC remains the most cost-effective and readily available alternative water source for the foreseeable future.

Future Surface Water Update

In January 2025, Governor Kemp recommended the appropriation of $501,700,000 in his Amended FY 2025 Budget to the General Assembly for "investment in the development and construction of surface water resources for Georgia's Coastal region to meet growth in demand."[1] This investment was announced as a means to assist with the growth for industrial water needs in the greater Savannah area, including Bryan and Bulloch Counties[2]. This allocation of $501.7 million is part of the State's $40.5 billion mid-year budget, which was approved by the General Assembly on March 3, 2025, and signed into law by Governor Kemp on March 6, 2025.

The City of Savannah, Effingham County, and Bryan County are currently working on the requisite intergovernmental agreements between one another to finalize governance of the proposed regional surface water supply and transmission system. In addition, planning and design efforts for the infrastructure components of the regional surface water system and transmission system is also underway. The following sections provide an overview and update of these various planning and design efforts.

Summary of Regional Surface Water Supply Improvements

The following is a summary of necessary short-term and long-term infrastructure improvements and financial needs to transition BC from the current Yellow Zone Floridan aquifer groundwater supply system to a more sustainable blended Green Zone Floridan aquifer groundwater and surface water system:

1. Short-Term Improvements:

    1.1 Construction of Bryan-Bulloch Green Zone Wells and Infrastructure

    Based on current Phase 1 design, permitting, and construction schedules provided by our regional partners COS and EC, it is currently anticipated that the earliest surface water availability will be in 2030.

[1] Governor Brian P. Kemp, *The Governor's Budget Report Amended Fiscal Year 2025 and Fiscal Year 2026*, at 7 and 118 (Jan. 16, 2025), *available at* https://opb.georgia.gov/document/governors-budget-reports/afy-2025-and-fy-2026-governors-budget-report/download.

[1] See Adam Van Brimmer, *State to address Savannah's water woes with half-billion dollar investment*, The Atlanta Journal-Constitution (Jan. 13, 2025), *available at* https://www.ajc.com/news/georgia-news/state-to-address-savannahs-water-woes-with-half-billion-dollar-investment/COP32VYEUFAMTFJLTDSZ65MXOY/ ("…the new system is expected to be operational by 2030 and would solve a logistic issue plaguing local government and economic development officials: supplying surface water to the Hyundai electric vehicle factory that opened in October along I-16 west of Savannah.").

Therefore, in order for Bryan County, Bulloch County, and the State to meet their obligations to HMGMA and the HL-GA, Bryan County and Bulloch County must proceed with the awarded construction contracts for the drilling of four (4) new Floridan aquifer wells and related infrastructure within Bryan and Bulloch Counties. Bryan County and Bulloch County have an existing IGA, which governs the construction, operation, maintenance, and charges for this groundwater supply. Furthermore, the recently issued Groundwater Withdrawal Permit No. No. 016-0013 allows BC to utilize 3.5 MGD on a monthly average and 3.5 MGD on an annual average from the Floridan aquifer from two wells located in Bulloch County; and Groundwater Withdrawal Permit No. 016-0014 allows Bulloch County to utilize 3.5 MGD on a monthly average and 3.125 MGD on an annual average from the Floridan Aquifer from two wells located in Bulloch County. These four wells and the associated water transmission main system are scheduled to be completed in two phases, with the first coming online in Q2 2025, and the final phase operational in Q4 2025.

1.2 Implementation of Joint Well Mitigation Program

In accordance with Special Conditions Item 6)c of the referenced groundwater withdrawal permits, Bryan and Bulloch have completed and posted, on their respective websites, a joint well mitigation program. The joint Bryan-Bulloch Groundwater Sustainability Program (GSP) addresses and provides mitigation measures to any existing Floridan aquifer private and agricultural wells, which is determined to be significantly impacted due to withdrawals from the four proposed Green Zone wells described in Paragraph 1.1 above. The GSP encompasses any affected qualifying wells, within the Mitigation Area, which is an area defined by a circle with a 5-mile radius from the center point at the I-16 and Highway 119 interchange. The GSP will be implemented for the duration of authorized groundwater usage from the permitted wells.

1.3 Funding for Short-Term Improvements

Based on the conditions enumerated in the Groundwater Withdrawal Permits as referenced in Section 1.1 above, GA EPD is requiring the replacement of groundwater supplied to the Mega-Site and the associated development under these permits, in its entirety, with alternative water sources. As stated herein, the State has made a major investment to accomplish this through the proposed regional surface water supply from the Savannah River. As funding for the wells and infrastructure described above has been provided for by State and Local Fiscal Recovery Funds (SLFRF) as distributed by the State, it is vital that full cessation of the well operation does not occur as it will potentially put those funds in jeopardy, as outlined in Section 2.2 below.

2. <u>Long-Term Improvements:</u>

2.1 General

The proposed regional surface water supply system will be completed in two phases over the next 10 to 15 years as illustrated on Exhibit 1. Phase I will consist of the following improvements, and is anticipated to be complete by 2030:

- Expansion of COS I&D production and pumping capacities
- Construction of Effingham and Bryan County Phase I water transmission mains

- Construction of elevated water storage tanks

Phase I goals include the improvements to the existing COS I&D water treatment facility to increase surface water supply to temporarily provide 3 to 5 MGD of capacity Bryan County.

Phase II consists of the following additional improvements, and is anticipated to be completed between 2035-2040:

- Further expansion of COS I&D production and pumping capacities
- Construction of Effingham County Phase II water transmission mains
- Construction of Effingham County raw water intake system and raw water transmission main
- Construction of Effingham County Water Treatment Facility (12 MGD capacity)

Phase II goals include the additional surface water supply to the region via the completion of a new 12 MGD surface water treatment facility in Effingham County as well as further improvements to the existing COS I&D water treatment facility to increase surface water supply to approximately 8 MGD. Once the EC water treatment facility is operational, the COS capacity of 8 MGD will be made available as supplement or "flex-supply" to the regional EC surface water system.

2.2 Completion of Planned Interstate 16 Water Transmission Main

In general, approximately 31,000 linear feet (~ 5.77 miles) of 30-inch diameter water main will be required to be installed along the Interstate 16 infrastructure easement corridor already acquired by Bryan County. This portion of the capital improvements, which are required to convey surface water to Bryan County, shall be divided into two sections, the first of which shall be constructed, owned, and operated by Effingham County and a second to be constructed, owned, and operated by Bryan County.

It is our understanding that EC shall install approximately 18,000 linear feet of water transmission main along I-16 from approximately the Effingham-Chatham county line to a termination point west of the Ogeechee River in Bryan County. Bryan County currently operates and maintains an 18-inch wastewater force main and has plans for a future parallel 18-inch force main through this corridor in accordance with existing Sewer Service IGAs with both COS and EC. Approximately 30-feet of existing Bryan County easement width could be shared with EC to facilitate the construction, operation, and maintenance of EC's portion of the transmission main.

Bryan County shall be responsible for the remaining portion of the 30-inch water transmission main from EC's termination point to existing HMGMA water main connection point. The portion of the capital improvements to be constructed by Bryan County generally include the following components:

- 13,000 linear feet of 30-inch water transmission main
- One (1) high-service booster pump station
- Chemical feed upgrades to existing water production wells

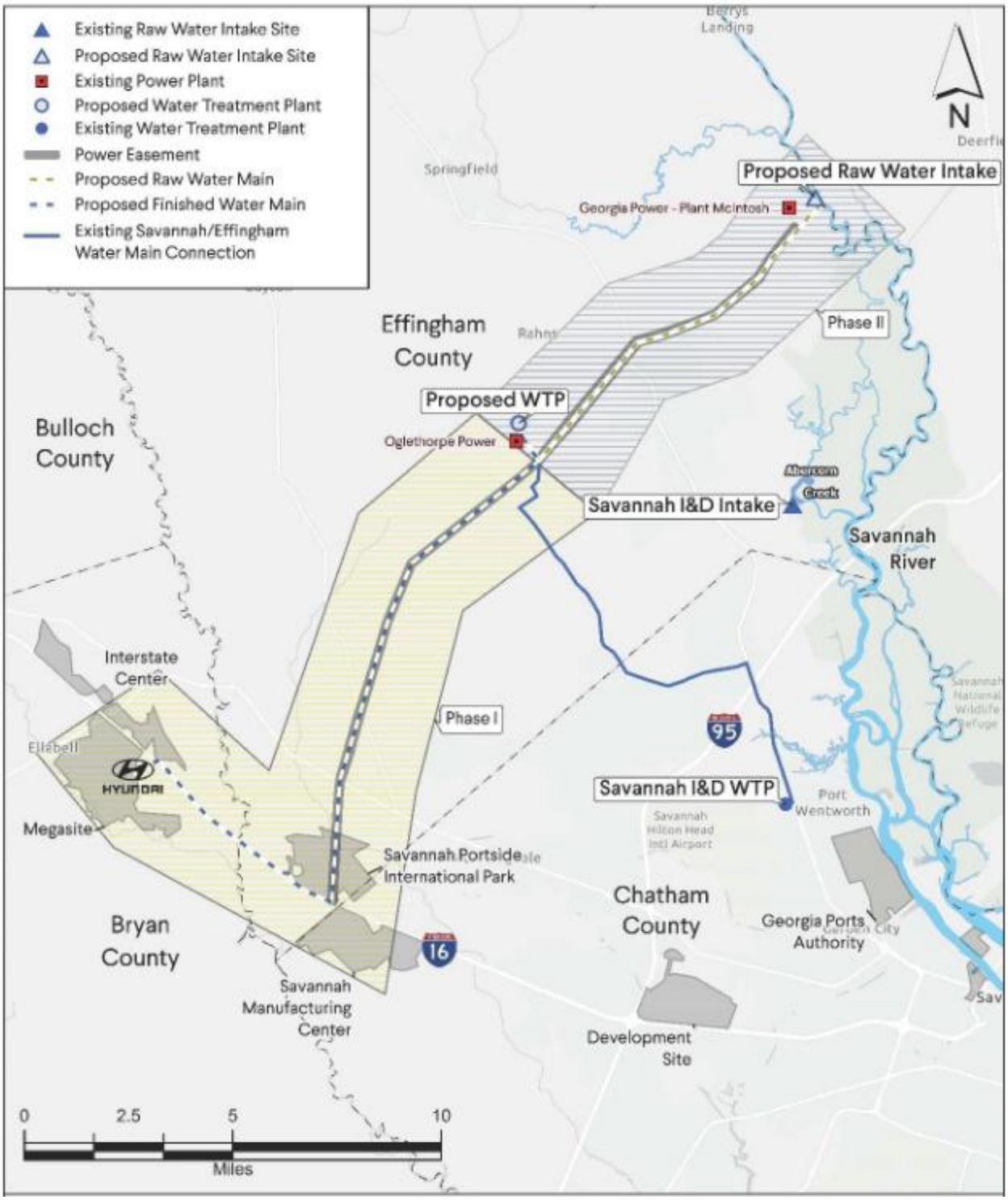

Exhibit 1. Regional Surface Water Supply and Transmission System

2.3 Continued Operation of Groundwater Supply Systems

As outlined in Bryan County's email to Rick Dunn and Trey Bennett (Governor's Office of Planning and Budget) and Ania Truszczynski (GA EPD) on June 14, 2024, our interpretation of US Treasury's Final Rule on State and Local Fiscal Recovery Funds (SLFRF), is concerning to Bryan and Bulloch Counties regarding jeopardy of federal funding if the wells are eliminated or significantly reduced in capacity. Specifically, if they are reduced to an amount which would disqualify Bryan County from the SLFRF program, and in the worst case down to zero. Bryan County submitted a Cost Effectiveness Analysis to OPB and GA EPD (inclusive in the Environmental Review and Planning Document) for review and approval. This document followed the guidance of US Treasury's SLFRF Final Rule, OPB's Cost Effectiveness Analysis Template, and DWSRF Fund Eligibility Handbook to demonstrate the following:

- The project was a necessary investment that is (1) responsive to an identified need to achieve or maintain an adequate minimum level of service, which may include a reasonable projection of increased need, whether due to population growth or otherwise and (2) a cost-effective means for meeting that need, taking into account available alternatives.

- In accordance with SLFRF Final Rule, "*investments in drinking water service infrastructure to supply drinking water to satisfy a projected increase in population, the project must also be projected to be sustainable over its estimated useful life*".

- The project would respond to a need to achieve or maintain an adequate minimum level of service, and would satisfy applicable standards to meet the needs of the population to be served. Pursuant to these guidance documents, the drinking water project must be sized such that it provides an adequate volume of water to households and other customers and must meet applicable standards for drinking water quality under the Safe Drinking Water Act (SDWA).

- SLFRF Final Rule states that "*a drinking water project that is designed to address a growing population cannot be considered a necessary investment if the source of drinking water will cease to be available to meet the population's needs before the end of the estimated useful life of the project*".

The Green Zone groundwater system consists of approximately $140 million dollars' worth of infrastructure, which can provide a long-term sustainable supply of drinking water to North Bryan County for continued residential growth with minimal impact to existing private drinking water wells and agricultural wells. We are of the opinion that the elimination of these wells is not in the best interest of Bryan or Bulloch, nor the region since short-term impacts, if any, to existing wells will be addressed by the GSP described in Paragraph 1.2. Furthermore, long-term impacts associated with potential effects to saltwater intrusion can be mitigated by reducing withdrawals from the proposed wells once supplemented by surface water supplied by our partners COS and EC. Finally, the combined projected long-term water demand for Bryan and Bulloch County is approximately 15.85 MGD. Based on the most recent planning update from

EC, which was the basis of EC's allotment of funds from the $501.7 million FY 2025 amended State budget, the new surface water treatment facility will be initially sized for 12 MGD. Future expansions can increase the proposed facilities capacity up to 24 MGD. However, EC's internal water needs as well as the water supply needs of Oglethorpe Power in Effingham necessitates a sustainable blend of surface water and groundwater supply to meet the long-term needs of Bryan and Bulloch Counties. We therefore request maintaining a continued, but reduced level of groundwater use no less than 50% of the current permitted withdrawal capacity, such that by 2030 all water supplied to the HMGMA, the HL-GA, and other associated development on the Mega-Site be fully replaced with surface water. This will allow all other surrounding development to be supplied with the remaining groundwater withdrawals from the Green Zone wells within Bulloch.

2.4 Disinfection System Conversion to Existing Well System

The existing and proposed groundwater supply systems operated by BC utilize multiple gas chlorine disinfection systems that are incompatible with surface water supplied systems that typically utilize a liquid sodium hypochlorite (aka chloramine) disinfection system. The proposed blended groundwater-surface water system will require BC to convert the disinfection system at each of five (5) wells sites and at the two (2) Bulloch County owned well sites to chloramine. Bryan and Bulloch County will commence the necessary planning and engineering to convert to the chloramine systems and shall have the required components installed ahead of the connection to the new regional surface water system.

Summary

- Water Demand Projections - Bryan County estimates its long-term (25-year) water demand for north Bryan will reach approximately 14.85 MGD. Bulloch County anticipates a long-term (25-year) water demand of 1.0 MGD for the targeted growth area of southeastern Bulloch. Combined the areas served by the Green Zone wells under Permit No. 0016-0013 and 0016-0014 will need approximately 15.85 MGD over the next 25-years.

- Candidates for surface water alternatives. Both the Ogeechee and Savannah Rivers were considered. However, due to low instream flows and lack of upstream reservoirs on the Ogeechee, and the readiness and deliverability of surface water from the Savannah River via existing Savannah I&D water treatment facility and future Effingham County water treatment facility, the Savannah River was the selected supply source by the regional partners of COS, EC, Bryan County, and Bulloch County.

- Candidates for other alternative sources of water. Other candidates for alternative water supply were explored in Bryan's Environmental Review and Planning Document. None are feasible for a variety of reasons, especially when compared to the COS and EC surface water supply option.

- Initial prioritization and delineation of these alternative resources in terms of ready deliverability. As evidenced by the State approval of $501.7 million in funding, the regional water surface water supply project is the prioritized alternative and based on current planning will provide interim supplemental supply to Bryan and Bulloch in 2030.

- Initial prioritization of what specific areas will be served by these non-Floridan aquifer groundwater alternative sources. The regional surface water supply project will initially supplement and over time replace the Floridan aquifer groundwater supplied to the Bryan County Mega-Site including the water supplied to HMGMA and the HL-GA.

- Potential goals and milestones for this source water transition. The proposed regional surface water supply and transmission improvements will be completed in two phases. Phase I will be completed in 2030, and will include the availability of 3-5 MGD of surface water supplied by the COS I&D water treatment facility and conveyed via new transmission mains in Effingham and Bryan Counties. Phase II will be completed between 2035 and 2040, and will include a new EC raw water intake system and water treatment facility with an initial capacity of 12 MGD. Water from this facility will assist Bryan and Bulloch in meeting their long-term water demand needs by blending with sustainable groundwater withdrawals four Green Zone wells.

- Potential funding mechanisms for planning and implementation efforts for the development and delivery of alternative sources. The $501.7 million allocated included in the State's Amended FY 2025 Budget will provide the funding mechanism for the regional surface water supply and transmission project.