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

*Via Email*

July 6, 2022

Colonel Joseph R. Geary  
Commander, U.S. Army Corps of Engineers  
Savannah District  
Regulatory Branch  
100 West Oglethorpe Avenue  
Savannah, Georgia 31401  
Attention: Sarah E. Wise  
[sarah.e.wise@usace.army.mil](mailto:sarah.e.wise@usace.army.mil)

**Re: Electric Vehicle Original Equipment Manufacturing Plant (SAS-2015-00235)**

Dear Colonel Geary:

The Ogeechee Riverkeeper is submitting this comment letter on behalf of its members to urge the Savannah District to carefully analyze the application filed by the Georgia Department of Economic Development and the Savannah Harbor-Interstate 16 Corridor Joint Development Authority to prepare a site to accommodate an Electric Vehicle Original Equipment Manufacturing Plant. The site is located at the intersection of I-16 and Highway 240 in Bryan County, Georgia.

We submit these comments not in an attempt to halt or delay the project, but in an attempt to ensure that all the plant's adverse impacts on the Ogeechee River watershed are fully explored and addressed. Because of its size, this plant will forever change the watershed and will have both direct and indirect impacts on the entire region.

Ogeechee Riverkeeper 501(c)(3) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Canoochee River is about 108 miles long and the Ogeechee River itself is approximately 245 miles long. The Ogeechee River system drains more than 5,500 square miles across 22 counties in Georgia. More at [ogeecheeriverkeeper.org](http://ogeecheeriverkeeper.org).

Our concerns include the following:

- **Applicant:** Although there is considerable speculation in the media about the electric vehicle company behind this proposed project, neither the application, nor the public notice identify the company that will be building and operating the plant should the applicant

receive all the necessary authorizations. As a result, the public has no way to evaluate whether the company has a strong environmental track record or not. Also, it is interesting that the application number has remained the same even though the state of Georgia has become a co-applicant and the size of the site has grown considerably.

- **Lack of assurances the plant will be built and operated:** Previously, an automotive site was permitted by the Savannah District, wetlands were filled, streams were piped, a massive concrete pad was constructed, but the plant that was supposed to occupy the pad was never built. Significant environmental harm was suffered by the region with no corresponding economic or social benefit. The Savannah District must ensure that the company behind this effort is contractually bound to ensure such a result is not repeated. The application includes references to a letter of intent and to an economic development agreement for the project, which require the Georgia Department of Economic Development and the Savannah Harbor-Interstate 16 Corridor Joint Development Authority to secure the necessary permits for the construction of the pad but does not include any statement that these documents will require the electric vehicle company to take ownership of the site and build its plant.
- **Incomplete Information concerning the construction and operation of the plant:** The application explains that the plant

will accommodate various processes, including form pressing, fabrication, painting, product completion/assembly, quality control and special products production. The required distribution components include a train yard, truck yard, and finished product yard. The EVOEM complex will also include employee services components supporting the large workforce (e.g., food services, medical facilities, employee parking, training facilities, and administrative workspaces). The storage component will include the central storage building and liquid storage building. The quality facilities will include a product testing area, testing station, and other miscellaneous buildings required for quality assurance support. Additional components include waste facilities, security facilities, and utility facilities.

Yet, the application does not discuss the adverse environmental impacts that these activities will have on the Ogeechee River watershed and the region as a whole. Will the plant's vast impervious surfaces cause flooding in downstream communities? Will the plant cause unmitigated air, water, noise, and sound pollution? How will the plant impact traffic throughout the Savannah Harbor-Interstate 16 Corridor? Where will all these people live, go to school, and recreate? In short, it is not appropriate for the Savannah District to weigh the economic benefits associated with operation of the plant against the environmental impacts caused only by the construction of the pad.

- **Stormwater:** The application does not discuss how the electric vehicle company will address the massive amounts of stormwater that the plant will generate. Will this stormwater be directed, against Savannah District policy, into the wetlands surrounding the plant? Will the stormwater plan being developed take into account the more frequent and more intense storms that will surely engulf the plant in the coming years?

- **Wetlands and stream impacts:** As proposed, the construction of the pad would result in the loss of 221.36 acres of wetland, 763 linear feet of intermittent stream and 1.58 acres of ditch. It is not clear, however, whether the approved jurisdictional determinations were conducted during the time-period when the now vacated Navigable Waters Protection Rule was in place. Since the definition of waters of the United States provided in that administrative rule is no longer in effect, any AJDs performed applying that test would appear to be suspect.
- **Compensatory mitigation:** As compensatory mitigation, the applicant is proposing to purchase the 4,120.20 grandfather stream credits from Yam Grandy Mitigation Bank and satisfy the 1,328.24 grandfather (166.08 2018 SOP) wetland mitigation credit requirement through the Savannah District's In-Lieu Fee Program. The in-lieu fee program can only be used for mitigation if other sources of mitigation credits are not available. If this is the case, the application should provide this information and explain whether other mitigation banks will be approved during the permit process for this permit.
- **Plant expansion:** Since the application alludes to future expansions of the plant, the public should be informed of the probable size of these expansions and whether they will be limited to the current site and whether any waters of the United States will be impacted. Such cumulative impacts should be considered now, not separated out for a future permit modification.

If you have any questions concerning these comments, please contact me at 866-942-6222.

Sincerely,

Damon L. Mullis  
Ogeechee Riverkeeper