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December 1st 2025

U.S. Army Corps of Engineers Savannah District
Attn: Planning Branch, CESAS-PMP
100 West Oglethorpe Ave
Savannah GA 31401
To be submitted by e-mail to CESAS-planning@usace.army.mil

RE: Draft Hartwell Lake IWSSRR/EA

Dear Sir or Madam:

Lake Hartwell Association (LHA) is submitting this letter and attached Rider documents as a public comment pursuant to Notice of Availability EAXX-202-00-K6P-1761756498 published November 3, 2025, with revised expiration December 3, regarding the Draft Integrated Water Supply Storage Reallocation Report/Environmental Assessment (IWSSRR/EA) and Draft Finding of No Significant Impact (FONSI) for Hartwell Lake in Georgia and South Carolina (collectively, Report). LHA is an IRC Section 501c3 not-for-profit corporation established under Georgia law with a membership of about 800 drawn from all six counties that surround Hartwell Lake (Lake Hartwell) in Georgia and South Carolina. Our 'tag line' is "For the sake of the lake." We submit these comments in that spirit.

The Report is 87 pages long and is accompanied by hundreds of pages of detailed appendices. It is a great deal of information to digest and assess. LHA is presenting its preliminary comments via this letter and its Rider and reserves the right to comment further solely or by joining the comments of others submitted subsequently.

We present an overall Executive Summary, then a summary of our detailed comments, and then develop some of the points further in the attached Rider for those who have more time available to read them. We are happy to answer questions about our comments.

Executive Summary:

LHA is concerned that the analysis in the Report and Appendices that comprise the IWSSRR/EA and FONSI for Hartwell Lake (Lake Hartwell) is questionable. Some of the data (e.g. population projections) is significantly out of date and incorrect. Other data (such as water records that extend through 2013, but exclude information from 2014 to present,

and bathymetric analysis which lack three or more data points to assess the rate of sedimentation) is incomplete. The breadth of some data (e.g. the Significant Change Appendix) is too narrow, as e.g. it deals with climate factors but omits evaluation of the changes in residential and industrial development and agriculture in the relevant years. Projections of significant changes in water demand also omit game-changing events such as potential data centers that might draw water from any of the USACE reservoirs in the Savannah River Basin or the free-flowing river itself. These challenges, with the data underlying the analysis, suggest that a finding of no significant impact is premature.

More broadly, USACE's analysis was undertaken without updating the Savannah River Basin Comprehensive Study. LHA belies that a reallocation of storage in Lake Hartwell, as significant as this is, should not be finalized without first inventorying all the "permitted" withdrawals from not only Lake Hartwell but also from Lakes Russell and Thurmond and the free-flowing Savannah River and comparing them to the actual maximum withdrawals to date, and also estimating the aggregate total amount of additional current withdrawals that fall below the threshold requiring a permit from South Carolina or Georgia. The inventory should also include all planned withdrawals which have not yet begun. That inventory in turn should be an appendix to the Report.

The report also assumes the continuation of the 13-year-old Drought Management Plan of 2012. The greatest stress from the proposed reallocation will come during droughts. Before the storage allocation is changed significantly the 2012 Drought Management Plan must be revised and the Drought Triggers set to occur at possibly different points as determined by the refreshed data.

LHA is sympathetic to the need to supply more water from Lake Hartwell to all the requestors. However, we believe determination of whether the specific allocations sought are appropriate in the context of all relevant factors is not possible from the analysis documented in the Report and its appendices. The Report and its appendices need to be updated and made more complete, and the Drought Management Plan of 2012 needs to be updated before the Report issues its finding. Coupled with this, the broad updating of the Savannah River Basin Study must also be launched – with full participation of South Carolina and Georgia and with not for profits such as LHA and Savannah Riverkeeper invited to participate before the Report is finalized.

Summary of Detailed Comments:

1. LHA acknowledges the applications of Anderson [South Carolina] Joint Water System (ARJWS); City of Lavonia, Georgia (Lavonia Pioneer Rural Water District (Pioneer); Currahee Club (Club); and City of Washington, Georgia (Washington) for increased or new water allocations as detailed in the Report. LHA similarly acknowledges the application of Hart County Water & Sewer Authority (HCWSA) in August 2025 for an increase in its storage allocation and what LHA understands is the application by the City of Hartwell earlier in 2025 for a water storage allocation to supplement its riparian rights.

LHA believes, however, that no approval should be given for further withdrawal of water from Lake Hartwell (yield from water supply storage) and /or Lakes Russell and Thurmond and the free-flowing river until USACE assembles (if it has not already done so) an inventory/tally of all currently approved withdrawals and a separate inventory/tally of the highest day of actual withdrawals thus far in 2025, coupled with USACE's best estimate of the additional withdrawals on that peak day that were below the threshold in South Carolina or Georgia (respectively) requiring a permit.

   a. If either or both such inventories already exist, LHA requests that they be included as an Appendix to the Report.
   b. LHA also requests that the Report describe how, if at all, these tallies were included in the models underlying the Report.

2. With these proposed substantial increased withdrawals (totaling 24.55 mgd) from Lake Hartwell and in light of changing conditions (climate, additional likely demands for water supply, and other) LHA urges that the 2012 Drought Management Plan (as updated via the October 2014 agreement with Duke Energy) be revised, and possible revised trigger levels be set for Drought stages 1, 2, 3 and 4. This revised document, and possible revised trigger levels, should be the <u>basis</u> of the baseline review of additional withdrawal requests, not vice versa.

3. LHA notes that the Report does not address the full extent of water supply issues on the Georgia side of Lake Hartwell. By e-mail of August 4, 2025, HCWSA notified USACE of HCWSA's request to increase its storage space in Lake Hartwell such that the yield would increase to 4.5 mgd, from the 2.2 mgd currently available to HCWSA or its assignee. LHA understands that City of Hartwell, Georgia (Hartwell) has notified USACE of its request to supplement Hartwell's riparian rights access to Lake Hartwell with an allocation of storage space. LHA further notes that it has also participated with other not-for-profits, Georgia counties, and Georgia public water authorities in an application for a SEED grant from Georgia's Environmental Protection Division (EPD) to create a Georgia Upper Savannah Partnership (GUSP) to gather facts and consider initiatives regarding water supply and water quality issues. As GUSP prepares a needs assessment, other requests for storage in Lake Hartwell and/or Lake Russell might emerge. As such, any further water supply requests should be delayed until the comprehensive needs assessment is completed.

4. The pending applications by ARJWS and Pioneer cover much of the geographic area in the South Carolina counties adjacent to Lake Hartwell. Nonetheless, similar to the situation in Georgia, the overall needs of South Carolina must be considered before USACE lays the groundwork via increased storage allocations for greater withdrawals (yields) from Lake Hartwell.

5. LHA hopes that USACE's consideration of the pending requests by HCWSA and Hartwell, as well as any water storage requests emanating from GUSP in the next 12 months, can be based largely on the large volume of data and analysis incorporated in the Report and the appendices to the Report, and the updates to

them that we are suggesting with this letter. In order to prevent recurrence of use of old, incorrect data (as has occurred with the Georgia population projections in the Report), it is imperative that future requests be processed more quickly than were the four requests underlying the Report. Publication of the draft for public comment within twelve months after the request would be reasonable, because so much of the preparatory work will have been done once the current Report is updated as LHA requests. The expense born by future requestors will also be reduced if the review is conducted in a more compact period. Such cost saving is in the public interest.

6. At Report Section 4.11.3 Reasonably Foreseeable Future Actions at page 60, USACE states that engineer hydrology modeling efforts incorporate "existing and proposed future water supply storage use into the model. Therefore, reasonably foreseeable future actions are accounted for in the engineering model." Were HCWSA's and Hartwell's existing requests for expanded water storage included? Were any others, such as any that might emanate from GUSP? Were new potential demands (such as by the proposed Trammel Crow data center to be located in Appling Georgia in Columbia County, which press reports say will draw water from the municipal system rather than from on-site wells) on Lakes Thurmond and Russell and on the free-flowing Savannah incorporated into the model? Were there any other future actions other than increased water storage that were incorporated into the model? As noted above, LHA suggests that no further approvals of withdrawals of water from Lake Hartwell be made until an inventory of all the permits already given as well as the total of actual usage of water below the level for which permits are required is made and published, and the effect of these already permitted activities in drought conditions is modeled and the results published.

7. LHA urges that in light of the many conditions that have changed since the most recent USACE Savannah River Basin Comprehensive Study, that a new comprehensive study be undertaken now. LHA believes that Study should include the Upper and Lower Savannah River Basins and should include massive projects such as Vogtle nuclear plants #3 and #4 and the Hyundai plant near Savannah. The quantity of electricity and water used by data centers is game-changing. The likely consequences of proposed and possible data centers must also be incorporated. LHA encourages Georgia and South Carolina to participate fully and hopes that not-for-profits such as LHA will be invited to participate.

8. LHA finds the discussion of Return Flow Credit (RFC) accounting confusing. Will RFC require HCWSA to pay more for its existing allocation of storage in Lake Hartwell or reduce the "yield" from HCWSA's existing allocation of storage? Unlike ARJWS and Lavonia, HCWSA does not have a wastewater treatment plant, and thus it cannot return water directly or indirectly to Lake Hartwell or Lake Russell. Additionally, in periods of drought, is the "return flow" apt to be diverted or delayed or applied to other uses? Will the assumption that 100% of the wastewater will be returned to Lake Hartwell or Lake Russell hold up in drought

conditions? Has this been tested?

9. The population projections in the Economic Analysis appendix at pages c-10 and c-11 understate the current and projected population for whom there is a potential demand for water from Lake Hartwell. For example, per the US Census Bureau website, Hart County's 2024 estimated population was 28,052. But the Report shows Hart County's projected population in 2025 as only 26,783-almost 1500 ***less*** than what it was already estimated to have reached by 2024. Per the Report, Hart County would not have reached a population of 28,052 until sometime between 2065 and 2070. It appears the population projections were gathered several years ago for inclusion in the Economic Analysis appendix, and there have since been significant population increases. Because population is such a significant driver of water demand, these statistics need to be updated and the models re-run based on the updated projections. Additionally, because it took so long to complete the analysis underlying the Report, other data may be significantly outdated. USACE needs to review all its underlying data to be sure that other outdated information was not used in the models.

10. The potential human demand for the water of Lake Hartwell also needs to include the seasonal, second home, and visitor population. The water recreation activities (boating, fishing, swimming) and scenic beauty of Lake Hartwell have attracted many second homeowners and visitors, particularly since the COVID pandemic. Also, RV use increased significantly nationwide during COVID. Not surprisingly, RV parks have been created in recent years in the counties adjacent to Lake Hartwell. Hartwell Basecamp (see https://basecamprvparks.com/basecamp-hartwell) is an example of such a camp. LHA saw no statistics in the report about this transient population and its demand for water.

11. LHA also did not notice an analysis in the Report of the demands for water coming from agricultural uses. For instance, poultry operations use water intensely. A single poultry operation may be using hundreds of thousands of gallons of water not only for hydration for the birds but also to use to cool the facility. Please include analysis of current and projected agricultural demands in the six counties adjacent to Lake Hartwell.

12. Lake level is important to boating safety, fishing (particularly during spawning), other recreational use, aquatic life, and water quality. While the impact during normal times from the Tentatively Selected Plan (TSP) on lake level appears to be small, several aspects of the reporting of the impact in normal and drought periods concern us. For example, the Report includes different figures for the average impact. In several places the Report and the appendices report the effect of the Tentatively Selected Plan (TSP) as decreasing the "***average***" water surface elevation in Hartwell Lake by 0.01 feet or 0.12 inches over the period of record (1939-2013). (emphasis added) (see, e.g, Executive Summary page ii). However, Table 36 at page 83 of the Report notes that "on average", Hartwell Lake would be 0.08 feet lower under the TSP. While this is still a small amount, it is eight (8) times the figure quoted in the Executive Summary of the Report. In Section 1.4

(Summary and Conclusions) in the Changing Conditions Appendix C at page 28-29, average pool level is projected to be 0.06 feet lower "with new water supply withdrawals than without."

13. We are also concerned about the collective impact on lake level in drought periods from all demand sources around Lake Hartwell and Lakes Russell and Thurmond and the downstream free-flowing river. Table 36 suggests that the modeling of the TSP showed that it would have produced 8 more days of Lake Hartwell's surface water level being 646 feet over the 1939-2013 period considered. Additionally, Table 28 at page 73 of the Report notes that under TSP "[t]here would be a 0.96 - inch decrease in drought conditions." More fundamentally, the model is based on historical conditions and does not seem to have a factor to reflect the increasing days with temperature above 95 degrees discussed in the Changing Conditions Appendix. We request that the Report include not just the "average" effects of the TSP, but also specifically what the effects on lake level will be when Hartwell Lake is 3 ft, 5 ft, 10 ft, 20 ft and 28 ft below full pool (LHA believes that Hartwell Lake has been almost 28 feet below full pool at least once since 1971). We also request that, as an additional test, the model be run using only data from the 2007-2009 drought. An AI search indicates that over the past 20 years, Lake Hartwell entered Drought Trigger Level 1 "at least" 5 times, Level 2 at least 3 times, Level 3 at least 2 times and none at Level 4. As of this writing, Lake Hartwell has just again entered Drought Trigger Level 1. Low lake levels increase the exposure of shoals which pose a greater safety risk for boaters. If the lake remains significantly below full pool at the end of May, public beaches may remain closed and at least some public boat ramps may become unavailable because of the lack of sufficient water at the lake-side end of the ramp.

14. At several points there is an assertion that "[t]he critical drought on record is a unique event, which will not be repeated." See, e.g. Report Section 5.13 Key Risk, Uncertainties, and Assumptions at page 77 and Engineering A at section 11.15.2 Hydrometeorological Variability and Uncertainty at page 89. Why does USACE conclude the drought of record will not be repeated? Does this mean that in modeling the effects of the TSP, the critical drought of record data was discarded from the data set? If so, what year or period was excluded? (Engineering Report Appendix A at section 9.1 "Critical Period and Parameters" at page 39 notes that 1998-2013 was the "most critically dry period in the last century"). If the critical drought has been excluded from modeling, please include in the final Report modeling that includes the critical drought of record. Please also explain why the modeling did not include a factor to reflect changes in climate conditions/climate variability.

15. Complete bathymetric studies of Lakes Hartwell and Russell need to be initiated in 2028 and 2033 and each completed in about one year to establish whether the rate of sedimentation is changing and if so by how much? Because development and land use restrictions or lack thereof can affect sedimentation, it is likely that the development activities around Lake Hartwell in the past 10-15 years have led to a greater rate of loss of storage due to sedimentation than was true for the first 20

years of the existence of Lake Hartwell.

16. In section 4.7 Socioeconomics, specifically in Section 4.7.1 Existing Conditions at pages 55-56 of the Report, there is a discussion of an economic impact analysis of low lake levels conducted 15 years ago (publication in 2010). That analysis was based on data from 2007 and 2008, which also overlapped with the "Great Recession". Then the COVID pandemic brought about increased use of Zoom and other teleconferencing to facilitate remote work. Visits to Lake Hartwell increased exponentially and the real estate market for second homes and for properties to be used for short term rentals skyrocketed in the counties surrounding Lake Hartwell. More recently, on October 9, 2025 The Hartwell Sun reported that a 2024 study showed that tourism had an impact of $57 million on Hart County. There may be similar reports regarding the other five counties that surround Lake Hartwell about tourism and/or the economic value of Lake Hartwell on Regional Economic Development (RED). LHA suggests that the Report include more recent data about tourism and the economic value of Lake Hartwell than the 2010 report.

17. The description of the customers of Lavonia in Report Section 3.2.2 Inventory of Existing Water Demand and Supply needs to be revised. Currently it says: "The City of Lavonia, Georgia currently serves 8,190 customers in Franklin County." LHA understands that today Lavonia's residential customers include some located in Hart County, pursuant to the "service delivery" law in Georgia. Additionally, HCWSA is a wholesale customer of Lavonia. Thus, Lavonia supplies treated water to HCWSA which in turn distributes that water, along with water from other sources, to its residential, industrial, and agricultural customers in Hart County. LHA understands that Franklin County GA is also a wholesale customer of Lavonia.

18. LHA is concerned that the cutoff date for modeling was 2013. As with the out-of-date population data discussed in comment # 9 above, excluding data from 2014 through 2024 may have led to conclusions which are no longer accurate. We are almost at the end of 2025. This Report needs to be based on recent, rather than outdated, data.

Thank you for your consideration of LHA's comments.
Please reply to confirm your receipt of this letter and the Rider to it.

Kenneth Terry Jackson

Kenneth Terry Jackson, Jr. / by Alicia Walker VP Lake Hartwell Association
President, Lake Hartwell Association