



LAKE HARTWELL ASSOCIATION, INC.

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December 6, 2025

Honorable Mike Collins
U.S. House of Representatives, GA 10th Congressional District
100 Court St.
Monroe, GA 30655

RE: Request for Support for USACE to update its 2012 Savannah River Basin Drought Management Plan, Savannah River Basin Comprehensive Plan, and data underlying USACE's Draft Integrated Water Supply Storage Reallocation Report/Environmental Assessment (IWSSRR/EA) and Draft Finding of No Significant Impact (FONSI) for Hartwell Lake

Dear Congressman Collins:

Lake Hartwell Association (LHA) is writing to you in your capacity as representative for Georgia's 10th Congressional District which includes (among others) Hart and Franklin Counties, and also in your capacity as Chairman of the House Subcommittee on Water Resources & Environment of the House Committee on Transportation, Water Resources, and Infrastructure. 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 (including Hart and Franklin) that surround Hartwell Lake (Lake Hartwell) in Georgia and South Carolina. Our 'tag line' is "For the sake of the lake." We submit the following comments and requests in that spirit.

We are asking that you support our requests:

- 1) that the Savannah District of the U.S. Army Corps of Engineers (USACE-SD) update its 2012 Savannah River Basin Drought Management Plan (Drought Plan) before it issues a Finding of No Significant Impact (FONSI) regarding requests by four entities for expanded water supply storage allocations in Lake Hartwell sufficient for all the four entities to collectively withdraw an additional 24.55 million gallons per day (mgd) from Lake Hartwell;
- 2) that USACE-SD work with South Carolina and Georgia, and not-for-profits such as the Savannah Riverkeeper and LHA to update USACE-SD's Savannah River Basin Comprehensive Plan (Comprehensive Plan). In a July 6, 2020 news release No. 20-19, USACE-SD ended the "second interim" of the Comprehensive Plan due to, among other reasons, "insufficient funding."
- 3) that USACE-SD do bathymetric analyses of the depth of Lakes Hartwell, Russell, and Thurmond in 2028 and again in 2033 to determine whether the rate of sedimentation that is filling in the lakes is a straight line or is changing.
- 4) If lack of funding is a reason why the Drought Plan and the Comprehensive Plan have not been updated and that it took until 2023 for the first bathymetric analysis

of Lake Hartwell since its creation, we also ask that you work with USACE- SD to obtain the required funding.

There has been much change in the counties surrounding not only Lake Hartwell, but also Lakes Russell and Thurmond and the free- flowing Savannah River south of Lake Thurmond, as well as change in climate, since the studies began in 2011 that led to the November 2025 publication of the Corps of Engineers' Draft IWSSRR/EA. Reliance on outdated data may lead to incorrect analysis. We ask that you work with USACE- SD to assure that in the future, requests for greater water storage allocations to support greater "yields" of water from Lake Hartwell can be assessed more rapidly and be based on current complete data rather than out- of- date incomplete data.

Updating the data underlying the current draft IWSSRR/EA, updating the Drought Plan and Comprehensive Plan, and conducting bathymetric analyses will be expensive. That is where you can be particularly helpful.

We suggest that we work with Greg Ziesenhene, Sallie Fuller, and others of your staff to assess how you and we can best help provide USACE -SD with the resources that it needs. We point out that USACE-SD's current commanding officer, Col. Ron Sturgeon, is not responsible for the 14 years it took between the initial requests for additional water supply storage to support additional withdrawals to the draft approval in November 2025.

Highlights of LHA's Comment Letter, set forth below, demonstrate the need for updated data and for updating the Drought Plan and the Comprehensive Plan:

- **Outdated/Incomplete Data:** The analysis relies on significantly outdated population projections and incomplete data, such as water records that exclude information from 2014 to present. Bathymetric analysis showing the rate of build - up of sediment is also lacking.
- **Narrow Scope:** The analysis fails to evaluate significant changes in residential/industrial development and agriculture and omits game-changing events like potential data centers that could dramatically increase water demand.
- **Updated Drought Plan Needed:** The report relies on the 13-year-old Drought Management Plan of 2012. LHA believes this plan must be revised, and Drought Triggers reset using refreshed data before any significant storage allocation change is finalized.
- **Required Inventory:** LHA believes the USACE should first inventory all permitted and planned withdrawals from Lakes Hartwell, Russell, and Thurmond, and the free-flowing Savannah River itself.
- **Conclusion:** The finding of "no significant impact" is premature due to the underlying data challenges. The report and its appendices must be updated, and an update of the Savannah River Basin Comprehensive Study should be launched with full participation from South Carolina, Georgia, LHA, and other not-for-profits before the report is finalized.

Thank you for consideration of LHA's requests. I have copied Mr. Ziesenhene and Ms. Fuller on this letter (which I will send to them by e-mail) and will reach out to them. I will also e-mail to them the electronic version of LHA's full comment letter (including a rider

and an attachment) to the USACE- SD on the draft IWSSRR/EZ and FONSI for Hartwell Lake.



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