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January 30, 2020

Land Protection Branch, Georgia EPD  
4244 International Parkway, Suite 104  
Atlanta, GA 30354  
*Via email john.sayer@dnr.ga.gov*

Cc: Keith Stevens, William Cook, Chuck Mueller

**Re: Draft Site Limitations for Brantley County Development Partners, US 82 Solid Waste Handling Facility – South, Brantley County, Proposed Municipal Solid Waste Landfill, APL 01301**

Dear Mr. Sayer:

Thank you for extending the comment period on the Draft Site Limitations for the Brantley County Development Partners, Proposed Municipal Solid Waste Landfill. Please accept these comments in addition to the ones submitted by Satilla Riverkeeper on January 13, 2020.

I am concerned that not all domestic/private drinking water wells and residences are included in the Site Assessment Report submitted by IES on behalf of the Brantley County Development Partners, LLC. It is important to do a thorough analysis of this because all of the drinking water in this part of Brantley County is sourced from private and public wells. It is also possible that not all private wells are registered with the Department of Health. In conversations with residents, I learned that many people drill their own “off the grid” wells to supply water to their residences and/or livestock. It is reasonable to assume that each residence has to have a source of drinking water, and therefore, each residence has a well. By comparing the well data provided by the Department of Health with an aerial image of the area, it is obvious that the dataset is incomplete.

In the attached Figure 1, well locations provided by the Brantley County Department of Health from 2009 to present are marked by a yellow triangle. Well locations obtained from Welstrom Coastal mapping app ([welstrom.com/welstromCoastal](http://welstrom.com/welstromCoastal)) sourced from the Georgia Department of Public Health are marked by a blue dot. Addresses of residents who attended an informational meeting about the proposed project are marked by a green circle. There is some overlap between the three datasets, but there are also some inconsistencies with what is shown in the Site Assessment Report submitted by IES Figure 1-05. In the attached Figure 1, the yellow line demarks a 1-mile radius around the proposed site. All wells and residences should be considered within this 1-mile radius to be consistent with Brantley County’s Solid Waste Management Plan (SWMP) and protect public health and the environment. Listed below are the locations of wells that were not included in the analysis in the Site Assessment Report (there may also be others that were missed):

23185 Hwy 82, Waynesville, GA 31566  
21496 Hwy 82, Waynesville, GA 31566  
756 Red Hawk Dr, Waynesville, GA 31566  
999 Hope Rd, Waynesville, GA 31566  
4434 Old Waynesville Rd, Waynesville, GA 31566  
3375 Waynesville Rd, Waynesville, GA 31566  
3395 Waynesville Rd, Waynesville, GA 31566  
3592 Waynesville Rd, Waynesville, GA 31566  
4181 Waynesville Rd, Waynesville, GA 31566  
4326 Waynesville Rd, Waynesville, GA 31566  
4415 Old Waynesville Rd, Waynesville, GA 31566  
4425 Old Waynesville Rd, Waynesville, GA 31566  
4613 Old Waynesville Rd, Waynesville, GA 31566  
4810 Old Waynesville Rd, Waynesville, GA 31566  
5076 Old Waynesville Rd, Waynesville, GA 31566  
5126 Old Waynesville Rd, Waynesville, GA 31566  
5224 Old Waynesville Rd, Waynesville, GA 31566  
5260 Old Waynesville Rd, Waynesville, GA 31566  
5381 Old Waynesville Rd, Waynesville, GA 31566  
5669 Old Waynesville Rd, Waynesville, GA 31566  
25061 Hwy 82, Waynesville, GA 31566  
25380 Hwy 82, Waynesville, GA 31566  
85 Mineral Springs Rd, Waynesville, GA 31566  
216 Tyson Rd, Waynesville, GA 31566  
2945 Buster Walker Rd, Waynesville, GA 31566  
1495 Buster Walker Rd, Waynesville, GA 31566  
115 Couper Rd, Waynesville, GA 31566  
212 Joseph Wiggins Rd, Waynesville, GA 31566  
335 Joseph Wiggins Rd, Waynesville, GA 31566

Attached Figure 2 shows the land parcels in the vicinity of the proposed site. Parcel data was obtained from Welstrom Coastal sourced from the State of Georgia processed by ITOS, University of Georgia. Parcels that are green are “improved,” and parcels that are gray are “unimproved.” It can be assumed that the improved parcels have a structure on them, and if there is a structure (like a house or cabin), there is likely to be a well.

Figure 3 (attached) shows the Land Use of the parcels in the vicinity of the proposed site. This data is part of the parcel dataset in Welstrom Coastal. The purple shows “residential.” Dark green is “agricultural.” Light green is “conservation.” Blue is “commercial.” Red is “none.” The area that borders the proposed site to the south and east are deemed residential. In Brantley County’s SWMP, it reads:

*“Solid waste management facilities shall provide a minimum 200-foot buffers between the waste disposal boundary and the property line, and a minimum 1 mile buffer between the waste disposal boundary and any residential dwelling or residentially zoned property and any dwelling's operational private,*

*domestic water supply well in existence on the date of permit application and/or permit approval. The waste disposal boundary is defined as the limit of all waste disposal areas, appurtenances, and ancillary activities (including but not limited to internal access roads and drainage control devices). No land disturbing activities are to take place in these buffers, except for construction of groundwater monitoring wells and access roads for direct ingress or egress to the monitoring wells for sampling and maintenance."*

Please note that the maps and analysis included in this letter are preliminary, and not comprehensive. The drawing of the proposed site is an approximation based on the figures presented in the Site Assessment Report submitted by IES. I am presenting these maps in order to ask you to do your own thorough analysis of all the residences and domestic/private water supplies within *at least* a one-mile radius of the proposed site. In keeping consistent with Brantley's SWMP, any area less than 1 mile from a residence, residentially zoned property, or domestic/private well is not suitable for solid waste disposal.

Additionally, historical structures are not mentioned at all in the Draft Site Limitations. However, please note that in Brantley County's SWMP (the version included in the Site Assessment Report as Appendix E, Figure 22, page 331 of the PDF file AND in the 2017 amendment) shows a 5,078 yard buffer around the Sylvester Mumford House site. This reaches the proposed site of Brantley County Development Partners' solid waste landfill. Please verify this and include in the finalized Site Limitations for this project.

Thank you for your careful review of the site limitations for this proposed project. Please reach out to me with any questions about the concerns I have raised. I will continue to review the Site Assessment Report and share with you any concerns I find.

Sincerely,



Laura Early  
Satilla Riverkeeper and Executive Director



Figure 1

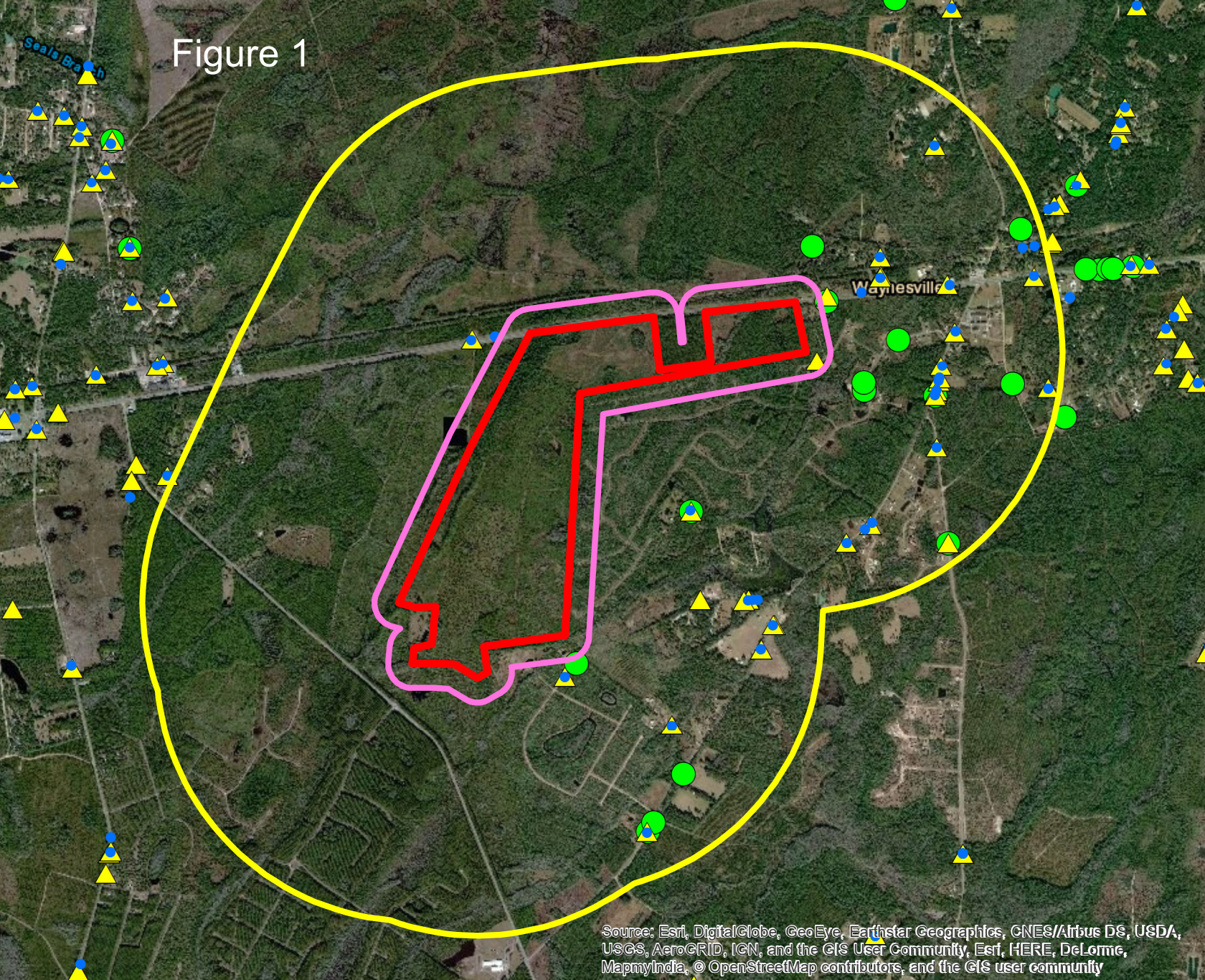
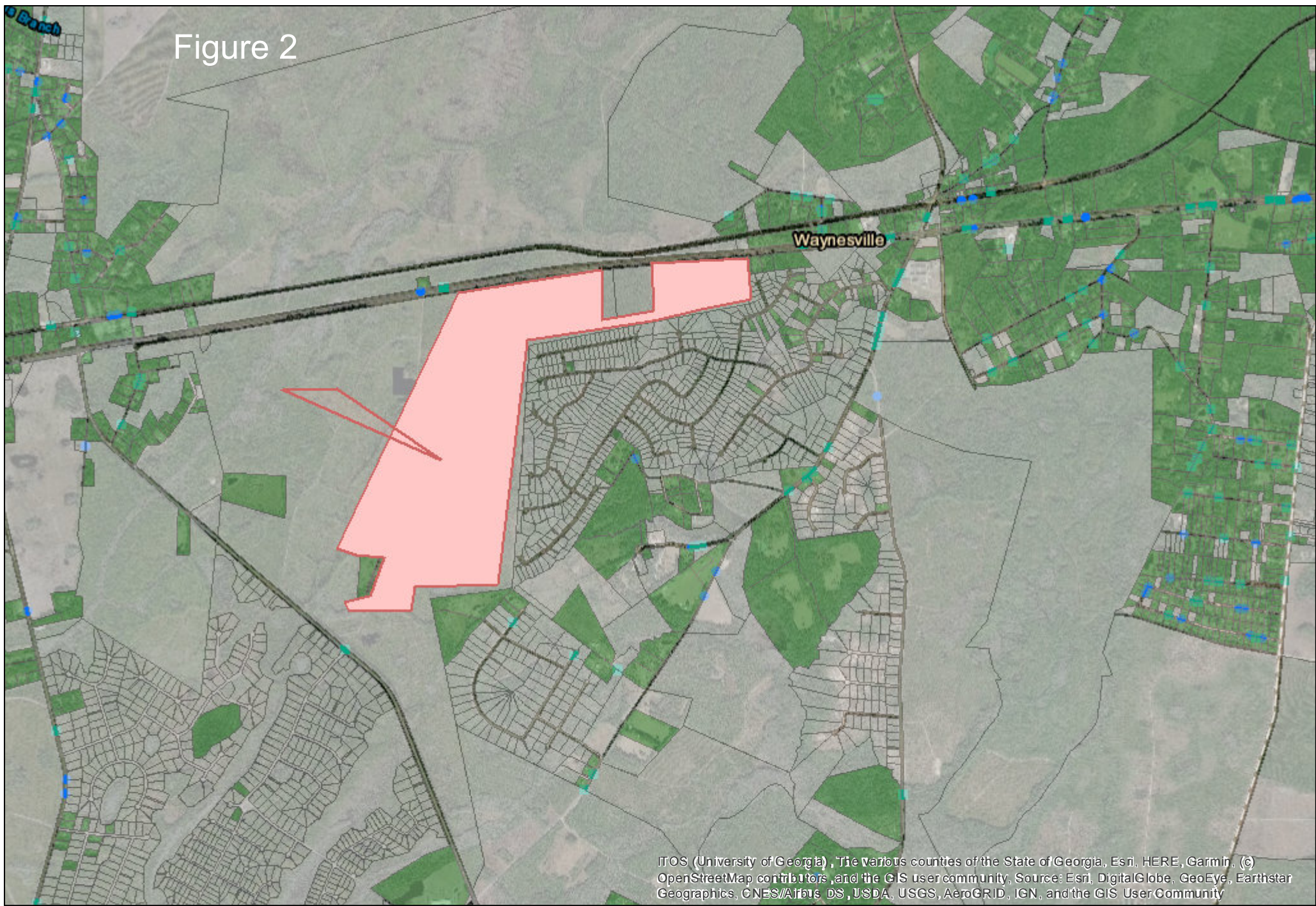




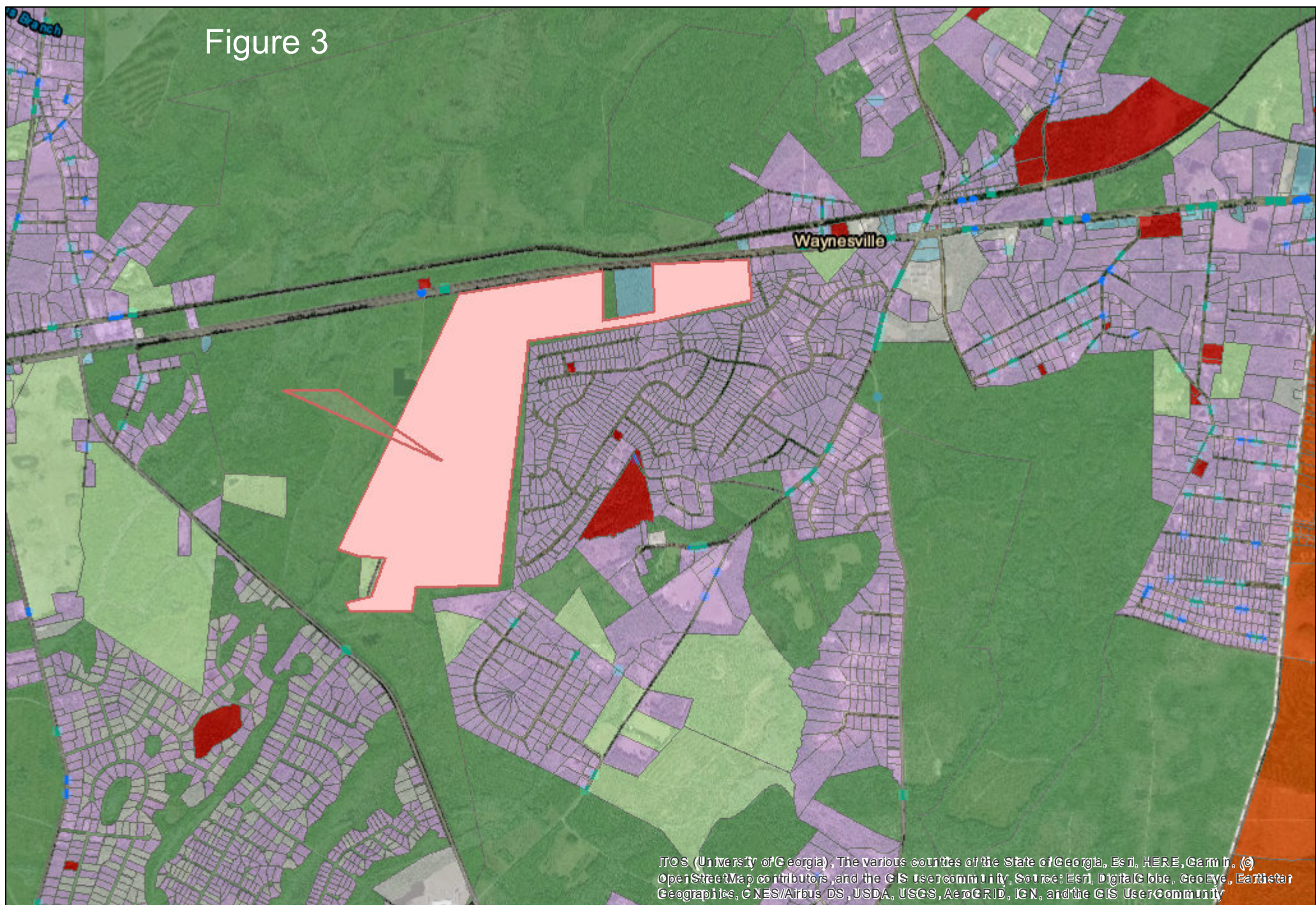
Figure 2



ITOS (University of Georgia), The various counties of the State of Georgia, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Figure 3



ITRS (University of Georgia), The various counties of the State of Georgia, Esri, HERE, Garmin, ©  
openStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar  
Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community