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June 17, 2022

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Katherine Moore*

Via Email adam.f.white@usace.army.mil

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Commander, U.S. Army Corps of Engineers
Savannah District Piedmont Branch
Attention: Adam F. White, Project Manager
4751 Best Road
College Park, Georgia 30337-5600

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RE: SAS-2020-00182 Rivian, 2003 acres
Stanton Springs North
Morgan and Walton Counties, Georgia

Dear Mr. White,

The Georgia Conservancy is pleased to provide this letter of comment for the project. There are many unique challenges for a project of this magnitude (2000 acres) to be sensitively developed, even by a company with a public environmental ethic such as that put forward by Rivian. The impacts that trigger a federal permitting nexus, such as the Individual Permit under section 404, should be reflected in the project's submittal and demonstrate a commitment to addressing these challenges.

Specifically, our comments relate to clarifying the balance between the project's impact on aquatic resources and the lack of integration into other aspects of site design that will drive water quality into the future. The drivers for comments and the need for additional information on the submittal include:

- The impervious impacts and related site development issues are almost unprecedented. In recent memory of our organization (ten years plus), we do not know of a similar single-use (owner-occupied) project of this size.
 - Have stream discharge impacts and offsite drainage issues in the larger basin been considered? It is unclear based on the information provided. Urgent questions to consider include: will there be a flow increase at the downstream drainage point (e.g., 10% point)? For a site with three creeks that spans over 2000 acres, the point at which this site is less than 10% of the drainage area is 20,000 acres, well over 20 square miles.

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- Is Stanton Springs North a stand-alone project? If not, how are the cumulative impacts of the broader multi-county Stanton Springs being considered by the Corps? The Rivian site is branded as Stanton Springs North, because it is an extension of and integral to a much larger multi-county Joint Development Authority project, including several thousand additional acres of new industrial/high tech development.
- What is the specific stormwater management goal beyond the state minimums cited in the application (section 9.0 Stormwater Management)? The application would benefit from clarification. To what extent will Green Infrastructure and other stormwater Best Management Practices (e.g., bioswales, pervious paving, etc.) be incorporated into this design to lessen the impacts to aquatic resources? Will sediment storage/channel protection measures typically be provided on large industrial sites? Similar projects have provided 24-hour release of the first inch of runoff, reducing polluted runoff and providing channel scour protection in the immediate downstream discharges.
- How were the other storm drainage plans for the different phases of Stanton Springs considered in this project's forthcoming stormwater management plan? For a site with impervious surfaces of this large scale, offsite routing of storm hydrographs will be a key element in the stormwater analysis.
- The submittal is missing evidence of Rivian's pledge to utilize tools and techniques that uphold environmental sensitivity.
 - How will Rivian commit to environmental stewardship in its land use for this project? This project represents a high-profile opportunity to incorporate Green Infrastructure and other measures into a cutting-edge manufacturing facility that will be visited by thousands of vendors, investors, and customers every year.
 - Rivian has committed to being a good environmental steward. The tie between the Rivian environmental program and the wetlands submittal is starkly absent. This must be corrected, as site design establishes the permanent future interaction between built and natural environment.
 - If Rivian commits to the environment and protection of aquatic resources, this foundational document (the design documents submitted to the Corps) should reflect those intentions.
 - Will there be future expansion into these areas on the site's west side, which drains to Dennis Creek (currently shown as not impacted)?
 - If so, does the additional future cumulative impact need to include the "training center" and other built features that have been discussed by the design team but are not included in this permit application?
 - If not, will there be a consideration for an ecological restoration plan and a conservation easement for the remaining portion of the site? A mechanism to ensure conservation of undeveloped portions of the site in perpetuity would serve as a resolute example of the commitment to the reduction of environmental impacts.

- Additional details related to site stormwater Best Management Practices (BMP), stream mitigation on impacted and other streams at the site:
 - There are documented streams of 42,520 linear feet (8.6 miles) on the project site. (note the minor difference in section 4.8 (and other places) stating 42,341 lf)
 - Has any consideration been given to enhancing degraded (incised and otherwise impacted) streams to remain onsite, specifically in regards to the Dennis Creek drainage basin? No onsite restoration is indicated for any of the site (all three drainages).
 - Will native plantings be used to stabilize the site from erosion and for landscaping?
 - Has consideration been given to enhancing culvert design such as bottomless culverts or energy dissipation using natural infrastructure? The standard details (P18 culvert) show generic storm culverts.
 - When will stormwater ponds on the Corps submittal reflect the actual design and geometry of the actual construction plans? Stormwater management ponds on the submittal package are schematic and seem not to include site grading or retaining walls on hilly North Georgia terrain.

Our comments relate to wetlands and water quality issues under the purview of permitting and site design implementation within the scope of the Corps of Engineers. That being said, Georgia Conservancy is aware that the wetland permitting issues are not the most significant environmental or development impact issues that the people living in the three-county area surrounding Rivian Project will face from the project.

A local public hearing is warranted to update this project's design and technical aspects and receive public input from neighbors and downstream property owners.

Thank you for seeking comments and using a process that allows for input from stakeholders. Please let me know if you have any questions or need any information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles H. McMillan, III". The signature is stylized and includes a small symbol at the end that resembles a cross or a plus sign.

Charles H. McMillan, III
Natural Resource Director

CC: Ms. Katherine Moore, President, Georgia Conservancy