



**Coastal Estuary Protection Association, Inc.**  
Lake Side Center  
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November 22, 2008

Ms. Jane Hendricks  
Program Manager  
Permitting, Compliance & Enforcement  
The Georgia Environmental Protection Division  
4220 International Parkway, Suite 101  
Atlanta, Georgia 30354-3902

RE: Liberty County Development Authority LCDS TEWRF  
(Liberty County, Georgia)

Dear Ms. Hendricks,

As the president of the Coastal Estuary Protection Association, Inc., I am sending you this letter on behalf of our 100 plus members and citizens of the State of Georgia who seek to protect Georgia's coastlands, marshlands, and saltwater estuaries.

The Liberty County Industrial Authority also known as the Liberty County Development Authority (the "LCIA") seeks a permit from the Georgia Environmental Protection Division ("EPD") to discharge up to 3 million gallons per day of wastewater into the Laurel View River in Liberty County, Georgia, through the requested approval of Draft Permit Number GA0039101 dated October 17, 2008 (the "LCIA Draft Permit").

Approval of the LCIA Draft Permit by the EPD would have a significant, long-term impact on the St. Catherines Sound estuary (the "St. Catherines Sound Estuary"), the Atlantic Ocean, and the saltwater marshlands, sounds and the connected ecosystems of the State of Georgia. Therefore, it is appropriate and reasonable to request that the EPD hold an informational meeting followed by a public hearing on a separate date to allow important issues to be considered prior to the issuance of this unique and unprecedented wastewater discharge permit into a saltwater estuary.

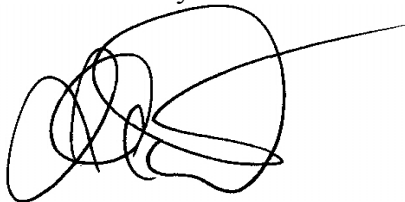
While water quality matters have been addressed by the EPD and the LCIA in the LCIA Draft Permit, the impact of treated wastewater discharge derived from a freshwater aquifer into the saltwater St. Catherines Sound Estuary has not been adequately addressed. As part of its process, it is vital that the EPD consider some very basic and unique elements and attributes of the St. Catherines Sound Estuary, the Laurel View River, and the LCIA's wastewater project (the "Wastewater Project") prior to the issuance of a precedent setting permit of such significance.

Following, please find some important points which call for further research and consideration by the EPD and the LCIA:

1. The Laurel View River and the river system between Liberty County and Bryan County is not a river system as typically defined but actually a "tidal basin," without any material volume of water flowing to or through the Laurel View River or the St. Catherines Sound Estuary to the Atlantic Ocean.
2. The flow of saltwater in this tidal basin is caused by a bi-directional tidal flow from St. Catherines Sound inland to and from inland tributaries to St. Catherines Sound. This tidal flow causes water levels to rise and fall in the Laurel View River and St. Catherines Sound Estuary over 7 feet from low tide to high tide and from high tide to low tide approximately every 6 hours.
3. As a result of the generally captive flow of saltwater in this tidal basin, a primary concern is that a concentration of treated freshwater discharged into this pristine saltwater environment will create an ever-expanding pool of freshwater which will forever alter salinity levels resulting in a dramatic change in an evolved ecosystem which would destroy the environment for saltwater organisms in this area and ultimately the region.
4. Environmental problems in the tidal basin would obviously be exacerbated in the event pollutants were accidentally discharged, causing the toxic effect and impact of pollution to do damage over an extended period of time due to the inability for the pollution to be disbursed and further diluted as would be the case if discharged into a free flowing river of water which ultimately mixes with the waters of the Atlantic Ocean or another larger body of water.

We appreciate your consideration of these matters and our request in advance.

Sincerely,  
Coastal Estuary Protection Association, Inc.

A handwritten signature in black ink, appearing to read "J. Allen Davis". The signature is stylized and somewhat abstract, with several overlapping loops and a long horizontal stroke extending to the right.

J. Allen Davis  
President

JAD:dj