

From: (b) (6) Privacy, (b) (7)(C) Enf. R.
To: [ECRD Complaints](#)
Subject: COMPLAINT UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964
Date: Monday, July 27, 2026 9:47:02 AM

You don't often get email from (b) (6) Privacy, (b) (7)(C) Enf. Privacy [Learn why this is important](#)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

TO:
U.S. Environmental Protection Agency
External Civil Rights Compliance Office (ECRCO)
1200 Pennsylvania Avenue, N.W. (Mail Code 2310A)
Washington, DC 20460
Email: Title_VI_Complaints@epa.gov

COMPLAINANT:

(b) (6) Privacy, (b) (7)(C) Enf. Privacy

Guyton, Ga 31312

(b) (6) Privacy, (b) (7)(C) Enf. Privacy

RECIPIENT OF FEDERAL FUNDS:

Effingham County Board of Commissioners
Effingham County School District (Blandford Elementary School oversight body)
Georgia Department of Community Affairs / Coastal Regional Commission

DATE: July 27, 2026

I. INTRODUCTION & GROUND FOR COMPLAINT

This administrative complaint is filed pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and the Environmental Protection Agency's implementing regulations at 40 C.F.R. Part 7.

The Complainant(s) challenge the discriminatory actions and severe planning misdirections executed by the Effingham County Board of Commissioners in fast-tracking Project Camellia, a proposed \$20 billion, 1,400-acre, 3.2-gigawatt OpenAI hyperscale data center.

The county has authorized this massive, heavy-industrial energy and utility hub to sit directly at the intersection of Gateway Parkway and Hodgeville Road, placing it less than a quarter-mile from family neighborhoods and less than a half-mile from Blandford Elementary School.

II. STATUTORY BACKGROUND & JURISDICTION

Title VI prohibits any program or activity receiving federal financial assistance from discriminating on the basis of race, color, or national origin. Under EPA regulations, recipients of federal funds may not utilize criteria or methods of administrative planning that have the effect of subjecting individuals to discrimination, or creating an unjust disparate impact.

Effingham County, its public infrastructure departments, and the local public school grid receive significant streams of federal financial assistance. Therefore, their land-use and infrastructure approvals remain strictly bound by federal civil rights mandates.

III. STATEMENT OF FACTS & INFRASTRUCTURE MISDIRECTION

For the past five years, Effingham County officials have systematically expanded heavy utility capabilities, widened roads, and laid high-capacity sewer lines along the McCall Road and Hodgeville Road corridors. Local authorities publicly cloaked these disruptive infrastructure projects as necessary updates to mitigate regional "residential growth" and support the surrounding subdivisions.

This justification was a material deception by omission. The county was quietly preparing a heavy industrial envelope to accommodate a massive tech campus. By cloaking this mega-project under the guise of residential planning, the county bypassed the rigorous, localized environmental impact assessments, public transparency hearings, and zoning adjustments that a 3.2-gigawatt data center would normally trigger.

The choice of the Gateway Parkway and Hodgeville Road intersection establishes an aggressive industrial wall directly adjacent to the two largest residential communities in Effingham County and an elementary school.

IV. DISPARATE ADVERSE ENVIRONMENTAL IMPACTS & TARGETED DEMOGRAPHICS

The neighborhood surrounding the Gateway Parkway and Hodgeville Road intersection is a distinct, working-class enclave. The vast majority of families residing in this immediate corridor relocated to this portion of Effingham County specifically because they were priced out of homeownership within the Savannah city limits. Having exhausted their financial resources to secure stable housing, these families are completely captive to local zoning decisions and lack the mobility to flee industrial encroachment. [1]

Furthermore, public data demonstrates that 51% of the student body at Blandford Elementary School comes from low-income households and qualifies for the federal free or reduced-price lunch program. [1]

The operation of a 3.2-gigawatt industrial plant at this specific location inflicts unique, localized, and severe harms on this targeted, economically vulnerable community:

Acoustic Nuisance and Cognitive Impairment: The continuous, non-stop operation of industrial server-cooling fans produces a heavy, low-frequency hum. Academic and public health research confirms that exposure to continuous low-frequency noise disrupts children's sleeping cycles, elevates stress hormones, and severely impairs cognitive development and classroom learning retention, disproportionately harming a student body already facing economic hurdles.

Air Quality and Generator Emissions: To protect uptime, this massive campus relies on rows of heavy industrial diesel emergency backup generators. The routine testing and emergency operations of these generators emit high levels of particulate matter and toxic air contaminants directly into the breathing envelope of local homes and elementary school playgrounds.

Environmental Redlining: By utilizing the school property boundaries as a "free buffer zone," the county has insulated wealthier, higher-income sectors of the region while forcing an economically displaced, working-class neighborhood to absorb 100% of the ecological, structural, and acoustic degradation of a heavy energy plant. The county holds over 8,500 acres of isolated industrial land (such as the Plant McIntosh corridor) where this facility could sit safely away from people, yet they intentionally weaponized our neighborhood as the path

of least resistance.

V. RELIEF REQUESTED

To prevent a permanent violation of Title VI civil rights and irreversible environmental degradation, the Complainant respectfully requests that the EPA:

Accept jurisdiction over this complaint and initiate an immediate, formal investigation into the Effingham County Board of Commissioners' infrastructure planning practices.

Coordinate with the Georgia Department of Community Affairs to enforce an immediate permitting and zoning moratorium on Project Camellia until a full Federal Environmental Impact Statement (EIS) is conducted.

Require Effingham County to evaluate alternative, isolated sites within its 8,500 available industrial acres that do not place vulnerable children and working-class residential communities in an industrial sacrifice zone.

Respectfully Submitted,

(b) (6) Privacy, (b) (7)(C) Enf. Privacy