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www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

March 20, 2023

Via E-Mail

Karen Saunds, Grant Specialist
Coastal Regional Commission of Georgia
ksaunds@crc.ga.gov

Re: Comments on DRI# 3927, Project Y

Dear Ms. Saunds:

Ogeechee Riverkeeper's (ORK) mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and use that information to amplify the voices of those who speak for the watershed. One of our primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality and quantity.

The proposed rezoning of approximately 796 acres in Riceboro, Georgia, in unincorporated Liberty County identified by the DRI#3927 maps and proposals submitted, raises specific concerns with regard to water quality, water quantity, and habitat that ORK wants to bring to the CRC's attention.

1. Wetlands, Marshes, and Aquatic Integrity - Ogeechee Riverkeeper is concerned that approximately 3,700 acres of wetlands, marshes, and upland areas will be impacted by this development. While it is unclear from the narrative document and the maps provide exactly how much of these wetlands and marshlands will be affected, their function as vital areas of connectivity between terrestrial/upland and core aquatic areas is important to note. This essential role of maintaining a network of resilient and intact ecosystems will help support biodiversity, natural processes, and flood control amid changing climate conditions. Additional attention should be paid to the replacement of the bridge over Payne Creek due to its close proximity to the waterway and adjacent wetlands and marshlands. ORK requests that if this project moves forward that every effort possible is taken to avoid impacting these wetlands and marshlands. Monitoring should take place throughout all construction phases to ensure that the connectivity between uplands, wetlands, and waterways is not lost and water quality is not degraded.

2. Water Source - Due to the development's close proximity to the coast, we are concerned about the plans for potential onsite water sources. Saltwater intrusion into the Upper Floridan Aquifer in this area is already impacting water supplies, requiring reductions in groundwater extraction. The City of Riceboro, which the revised DRI notice announces will supply the development's water, draws its municipal water supply from groundwater. ORK is concerned that the 600+ residences, 130 hotel rooms, and numerous other amenities that this Master Plan describes will contribute to further groundwater issues by significantly increasing extraction. ORK urges careful consideration of the long-term groundwater impacts that this development will directly contribute to. There is also uncertainty as to whether the City of Riceboro will, in fact, be the main water supplier. Section H in the conceptual "Master Plan" states that Riceboro, community, or individual wells are all being considered. ORK requests clarification on this question and asks that the Master Plan be updated to reflect any confirmed changes.
3. Wastewater and Stormwater Management - The currently vague plans for how Project Y will sufficiently manage its wastewater and stormwater are concerning. First, regarding wastewater, ORK strongly urges the developers to avoid individual or community septic systems to manage its wastewater. Due to the proposed development's coastal location, the water table at Project Y is high, meaning septic systems are less effective at processing wastewater. Additionally, septic systems are vulnerable to rising ocean levels, further impacting their wastewater processing ability. Septic systems - individual or shared - should not be utilized for wastewater management at Project Y. ORK strongly urges the developers to utilize the City of Riceboro's wastewater treatment capacity and, if additional treatment is required, to construct its own on-site, non-septic treatment facility. Second, concerning stormwater, ORK is pleased to see that existing impervious surfaces will be utilized wherever possible, and that permeable trails and parking areas were announced. While these are preferable, ORK urges the developers to further minimize the construction of the estimated 13% impervious surfaces wherever possible. ORK also urges the developers to carefully consider retention ponds' and storm sewers' capacity and ability to ensure that untreated runoff does not enter North Newport River, Payne Creek, or any of their associated wetlands and marshlands. Finally, for both wastewater and stormwater, we ask that the plans announced in the revised DRI notice be incorporated into the conceptual "Master Plan" document to ensure that these promises are fully considered and executed in future decisions and stages of development.
4. Public Recreational Access - ORK is concerned with the lack of public recreational access along these segments of Georgia's salt marshes. Plans for Project Y only contemplate that "hotel guests" will have access to the Payne Creek marshes in the Heron Lake neighborhood. Likewise, only "homeowners" will have access to the North Newport River via the marina planned for the Harvest Lake neighborhood. We urge the developers to provide for public access at these two points so that Georgians can recreate in the publicly-owned lands and waters that surround Project Y.
5. Recreational Concerns - Two planned recreational activities raise concerns. First, the planned off-road all-terrain vehicle track planned for the Sport Club has potential negative impact to the aquatic environment. Though the maps are unclear on precise location, the track and field appear to be located on the southern banks of Payne Creek. Its immediate adjacency to Payne Creek, and to its associated wetlands and marshlands could lead to water quality issues and disturbed habitat. ORK suggests that this track and field be relocated away from wetlands and waterways, and that erosion reduction strategies are implemented as part of its

operation. Second, the seaplane hangar planned for the Harvest Lake neighborhood also raises concerns. It is unclear whether the hangar will be utilized, or if it will just remain as an unused structure. If use of the seaplane hangar is planned, ORK requests that the developers include detailed plans for its use, any plans for expansion or refurbishment, explanations for how habitat and water quality impacts will be mitigated, and environmental disaster response plans. If the hangar will not be used, ORK urges the developers to develop plans to remove the structures and impermeable surfaces and to restore the associated areas to their natural state.

Thank you in advance for your time and consideration; please let me know if you have any questions:

ben@ogeecheeriverkeeper.org or 866-942-6222 x9.

Ben Kirsch
Legal Director
Ogeechee Riverkeeper