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

April 6, 2023

Via E-Mail

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

Re: Comments on DRI# 3949 Hwy 80 Warehouse

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 ORK's primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality.

The proposed rezoning of approximately 102 acres on Highway 80 in Effingham County, as identified by DRI#3949's informational documents, raises specific concerns with regard to water quality and environmental degradation in the area that ORK wants to bring to the Coastal Regional Commission and future decision makers' attention.

1. **Stormwater Management** - The developers' sketch plans for on-property stormwater management as proposed raise serious questions and should not be approved at this time. The current plan's placement of a "detention facility" in the northwest corner of the property raises two issues. First, the detention facility's placement is immediately adjacent to the warehouse structure and parking lot. The lack of any significant buffer distances between the detention facility and these heavily trafficked areas raises concerns about structural integrity and potential vehicle incidents. ORK suggests increasing the distances between the detention facility and areas of frequent truck and cargo use. Second, the detention facility's placement next to the proposed well site raises the additional concern of groundwater contamination. The well's connection to groundwater provides a direct pathway for stormwater to enter the shared aquifer if the detention facility is damaged or otherwise fails. Increasing the distance between the well and stormwater would better prevent any potential groundwater contamination.

Wetlands are also not sufficiently addressed in the proposal. While the informational documents note that wetlands are present on the properties, they are never identified. Without knowing their exact location, ORK is concerned that this development may fill in these quickly disappearing natural resources. Likewise, there is a possibility that the wetlands occupy the same area as the stormwater detention facility. Developers should ensure that natural wetlands are not being replaced by an artificial retention pond.

Finally, the sketch plans do not sufficiently address impacts to neighboring properties. Vegetative buffering to support filtration is an important and necessary addition to the property, and ORK appreciates the developers' plans to add these features. However, the sketch plans and other supporting documents do not identify where these vegetative buffers will be placed. Further, without more information, ORK is concerned that stormwater runoff could impact adjacent properties that vegetative buffering will not address. Without topographical, grading, or soil composition information for this site, ORK is concerned that neighbors, especially the immediately adjacent residential properties, could face untreated industrial stormwater runoff entering their properties. This stormwater could also reach waterways. A small berm preventing fugitive stormwater runoff may be a potential solution, though without more information, this is just a potential solution. We urge the developers to more thoroughly consider and resolve these questions. Likewise, we urge county decision makers to address these issues early in the process rather than being forced to deal with them in the future.

2. Wastewater Management - ORK urges local, regional, and state decision-makers to consider a regional approach to wastewater management. The extensive development expected to accompany the Bryan County Megasite and Hyundai Facility will collectively require significant new wastewater treatment. Individually, like with the HWY 80 warehouse development, these projects do not represent enormous additions of wastewater to the area. But as a whole, their potential treatment needs could lead to environmental and water quality issues. Rather than rely on a large patchwork of septic systems that are difficult to maintain, monitor, and, eventually decommission, ORK sees a great opportunity for the region to expand the sewer and wastewater system with interconnection into the North Bryan Water Reclamation Facility. Expanding the sewer system will centralize wastewater treatment, make maintenance easier, reduce the potential for environmental issues from failing systems, and will result in better water quality outcomes. ORK urges local, regional, and state decision-makers to expand the sewer systems to better handle the significant wastewater increases expected in the coming years rather than relying on numerous septic systems to address the need.

If a septic approach is ultimately pursued for this project, the proposal raise a pair of concerns. First, the proposed location for the drainfield is immediately adjacent to the development's main entrance and parking lot, with essentially no buffer distance. Every truck and vehicle that enters the property will pass within feet of the drainfield. Just one driving incident by a heavy truck has the potential to damage the system and cause wastewater to escape onto the property, neighboring properties, and potentially into waterways and groundwater. ORK urges the developers to reconsider the drainfield's placement and increase its distance from areas with frequent truck traffic. Second, ORK is concerned about available space for a secondary/alternative drainfield. The documents included here do not identify where a future drainfield would be placed. Whether in response to future capacity limitations or for unanticipated malfunctions, developers should consider and identify where they will place a secondary septic drainfield.

3. Groundwater - ORK urges careful consideration of increasing groundwater withdrawals. Saltwater intrusion into the Upper Floridan Aquifer is a growing problem that is addressed only through reduced extraction. All newly proposed groundwater extractions, even the relatively small amount as proposed here, should be carefully considered, properly conditioned, and closely monitored. If this property is rezoned and groundwater withdrawals remain part of expected operation, we urge the permitting authority to condition use with strict withdrawal limits and consistent monitoring in order to prevent over-withdrawal to limit aquifer impact.
4. Conservation and Areas of Significant Natural Resources - ORK is concerned that this large industrial development is coming to an area with significant conservation uses. As noted in the Areas Requiring Special Attention (ARSA) map, the lands to the north and east of the proposed development are designated as “Areas of a Significant Natural Resources,” and are zoned as “conservation/recreation” in Effingham County’s Future Land Use Map. This seems to principally include a University of Georgia Foundation property that appears to be used by the Warnell School of Forestry & Natural Resources. Potential impacts not just to the natural resources themselves but to any ongoing research, educational opportunities, and long-term UGA plans should be fully considered and explored before these adjacent lands are rezoned.
5. Impact to Residential Neighbors - Immediately to the south and east of this property are 11 residences, joined by another 10 houses just on the other side of George Road. There are an additional 6 residentially zoned properties across Highway 80. The ARSA Map notes these as “Areas of Significant Infill.” Rezoning this property to allow for heavy industry will absolutely impact these residential properties. These residences are so close that they are included in the sketch plan for the warehouse.

During a recent Bryan County Board of Commissioners meeting, residents there who had their surrounding land slowly rezoned for industrial uses testified that they felt boxed-in and unsafe with frequent heavy vehicle traffic and were concerned about their property values. The proposed development’s closeness to these homes raises similar concerns, as well as potential nuisance sound, air quality, and stormwater issues. The rezoning decision should carefully consider whether siting industrial and its accompanying heavy truck usage so close to an area of significant residential infill is the best use of space for the residents of Effingham County.

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