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[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

April 21, 2023

**Via E-Mail**

Environmental Protection Division  
Watershed Protection Branch  
Wastewater Regulatory Program  
ATTN: August Lutkehus  
2 Martin Luther King Jr. Drive  
Suite 1470A East  
Atlanta, Georgia 30334  
[august.lutkehus@dnr.ga.gov](mailto:august.lutkehus@dnr.ga.gov)

**Re: Comments on Notice of No Significant Impact: Bryan County Board of Commissioners , GEFA Loan No. CW-2023-021 and ARPA Grant No. GA-0005950**

Dear Mr. Lutekehus:

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.

ORK offers these comments on the Georgia Environmental Protection Division's (GA EPD) determination that the North Bryan Water Reclamation Facility (NBWRF) will cause no significant impact on the environment. In general, ORK welcomes a new, high capacity wastewater treatment facility coming to the area. As the region grows in population, business, and industry, the NBWRF will present an invaluable opportunity to fully and proactively address the current and future wastewater treatment needs throughout Bryan, Bulloch, Chatham, and Effingham counties and other jurisdictions.

ORK's main concern with this proposal is how the NBWRF will ensure it achieves its stated goal of being a regional solution to wastewater treatment demands. Throughout the Environmental Review & Planning Document, Bryan County consistently highlights how the proposed NBWRF is not solely meant for its own use, but will be a regional tool. It states that the NBWRF is intended "to be a central advanced water reclamation facility for multiple

jurisdictions.”<sup>1</sup> ORK urges both GA EPD and Bryan County to keep this stated goal in mind during future wastewater permitting decisions in the area and to prioritize regionalization of wastewater treatment. Doing so will ensure better long-term environmental, public health, and economic outcomes in the coming years and decades.

To achieve this goal, ORK makes two suggestions: that the currently proposed NBWRF service area be significantly expanded to include more of North Bryan County, and that both Bryan County and the GA EPD continue supporting neighboring counties’ and jurisdictions’ access to the treatment facilities. Doing so will ensure the largest possible regional benefit by preserving water quality amidst development and preventing public health issues while efficiently utilizing limited financial resources to address wastewater treatment. Likewise, centering the long-term health of the Ogeechee River in the decision-making process will further ensure all of these goals are met.

1. The NBWRF’s service area should be expanded

To ensure Bryan County’s wastewater treatment needs will be addressed effectively and efficiently, the NBWRF’s designated service area should be expanded. Currently, the service boundaries are very small for a facility with such a large amount of treatment capacity.<sup>2</sup> The City of Pembroke’s service area, for example, is similarly sized to the NBWRF’s proposed area, despite Pembroke only having 0.5 MGD of treatment capacity. While the comparison between primarily residential Pembroke and the primarily industrial area around the NBWRF is not perfect, it highlights the potential positive impact that an expanded service area could provide while using relatively minimal treatment capacity. And with a combined 1.47 MGD reserved for “miscellaneous future” growth,<sup>3</sup> there seems to be plenty of opportunity to fully serve North Bryan County.

Bryan County and GA EPD should proactively seek to manage more of the county’s wastewater needs by expanding the NBWRF’s service area footprint.<sup>4</sup> ORK suggests an expanded service area of the whole of North Bryan County. At the very least, the service area should expand to serve all of North Bryan County Service Area 3.

a. The NBWRF should serve all of North Bryan County

To improve the environmental and economic future of Bryan County, the NBWRF’s service area should expand well beyond the proposed boundaries to encompass all of the northern county. Wastewater management through a closed sewer system and treatment facility is much preferred to on-site wastewater treatment systems when that option is available. Wastewater treatment at facilities result in much less impact to rivers, streams, wetlands, and groundwater. Sewer systems also avoid the future problems of aging and poorly maintained on-site systems. As is being seen in Chatham County, poorly-maintained, aging, and failing septic systems are contributing to public health and environmental issues, leading to polluted waterways and recreation areas. Often, the sources of these issues are dispersed and difficult to identify. These issues, and the expensive responses necessary to resolve the issue, can largely be avoided by connecting into consolidated sewer and wastewater treatment systems - saving county time, money, and

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<sup>1</sup> Thomas & Hutton. “Environmental Review & Planning Document for North Bryan Water Reclamation Facility” (EPRD). Revised March 2023. At pgs 1 and 11.

<sup>2</sup> ERP. At Exhibit 3.

<sup>3</sup> ERP. At pg. 7. Table 3-3 includes “Miscellaneous Future Industrial Developments” and “Miscellaneous Future Commercial and Residential.”

<sup>4</sup> Also called its “Service Basin.” See ERP at Exhibit 3.

effort in monitoring, locating, and remediating failing and poorly maintained on-site treatment systems. And as an additional benefit, businesses seeking to relocate to the area could avoid the additional planning, permitting, and costs associated with on-site wastewater treatment. Overall, a larger service area and associated sewer system would benefit Bryan County for generations to come.

In addition, as a Bryan County project funded with the time, efforts, and resources of Bryan County, the project should directly benefit as many of its residents and taxpayers as possible. While serving the whole county would be the best way to do this, Ft. Stewart splits the county and makes that all but impossible. As such, North Bryan County seems to be a logical and realistic range for NBWRF service. To achieve this, Bryan County should consider expanding its sewer system throughout the northern part of the county - potentially reflecting the 2025 Water & Sewer Master Plan.<sup>5</sup> Likewise, when reviewing applications for new land application systems and other on-site wastewater treatment systems, GA EPD should specifically consider whether connecting the property to the NBWRF is possible and give preference to that outcome.

b. Alternatively, the NBWRF should at least serve North Bryan County Service Area 3

At the very minimum, the NBWRF's service area should be expanded to include all of the "North Bryan County Service Area 3." As noted on the Hussey Gay Bell webpage, the 2025 Water & Sewer Master Plan for Bryan County divided the northern county into three service areas. The easternmost portion of northern Bryan County, which includes the megasite and the proposed NBWRF, are in Service Area 3. The NBWRF should service the entirety of this area. This relatively small geographic area will see the brunt of the expected residential, commercial, and industrial development in the coming years and will need to respond to increased wastewater treatment demands.

To proactively prevent this growing wastewater demand from becoming an environmental and financial issue in the future, Bryan County and the GA EPD should take advantage of the new facility being built in the immediate area. For the same reasons discussed in subsection above, new developments should prefer sewer interconnection over septic, land application, or other on-site wastewater treatment systems. ORK strongly urges Bryan County to expand the NBWRF's service area to the North Bryan County Service Area 3, and urges GA EPD to strongly prefer sewer interconnection over on-site treatment systems.

2. Support regionalization of wastewater treatment in neighboring counties and jurisdictions

The wastewater management opportunities that the NBWRF creates should extend beyond county borders. To achieve the stated goal of being a centralized facility for multiple jurisdictions, Bryan County should continue to collaborate with its neighboring counties and jurisdictions. Likewise, GA EPD should facilitate regionalization by prioritizing interconnection in its wastewater permitting decisions in the region. ORK encourages both entities to champion the NBWRF as a regional solution to wastewater treatment.

Neighboring counties and jurisdictions will need to utilize the NBWRF to respond to the region's expected growth. ORK is pleased to see a detailed arrangement with Bulloch County and the City of Savannah to address future

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<sup>5</sup> See Attachment A.

Also available at: <https://husseygaybell.com/portfolio/2025-water-sewer-master-plan-bryan-county-ga/>.

wastewater treatment needs in the Environmental Review & Planning Document.<sup>6</sup> ORK is also reassured to see ongoing negotiations with Effingham County and encourages Bryan County to find a workable agreement with its neighbor. Further, as the realities of the expected growth present themselves, ORK encourages Bryan County to readily share its reserved treatment capacity with its neighboring counties and jurisdictions.

The GA EPD should also prefer that new wastewater sources throughout the region be managed through the NBWRF. As with permitting decisions in Bryan County discussed above, GA EPD should specifically consider whether permit applications for on-site wastewater treatment could be better-addressed through interconnection with the NBWRF. And for the same environmental, public health, and economic reasons detailed above, GA EPD should avoid permitting new septic or land application systems in Bulloch, Chatham, and Effingham County where wastewater treatment needs could feasibly be met by the NBWRF.

3. Maintain the Ogeechee River's long-term water quality and aquatic environment

The success of responding to the growing wastewater treatment demand will be measured by the long term health of the Ogeechee River and its tributaries. While the NBWRF presents a better alternative to septic and land application systems for properly and effectively treating the expected increase in wastewater, ORK wants to highlight the importance of existing water quality limitations in the Ogeechee River Basin. As the receiving body for the treated effluent, the Ogeechee River and its recreation opportunities, ecology, and the fish and wildlife it supports should continue to guide operations.

GA EPD's Wasteload Allocation (WLA) for the NBWRF must be carefully adhered to. ORK is glad to see many references to and proactive thoughts around the WLA throughout the Environmental Review & Planning Document. ORK urges careful, consistent monitoring by the facility operators and strong oversight by GA EPD regulators, especially as new phases of the NBWRF come into operation. Further, GA EPD and Bryan County must remain in close contact as construction proceeds, changes to plans and operations occur, or further expansion of treatment capacity is considered.

Thank you in advance for your time and consideration; please let me know if you have any questions:  
[ben@ogeecheeriverkeeper.org](mailto:ben@ogeecheeriverkeeper.org) or 866-942-6222 x9.

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper

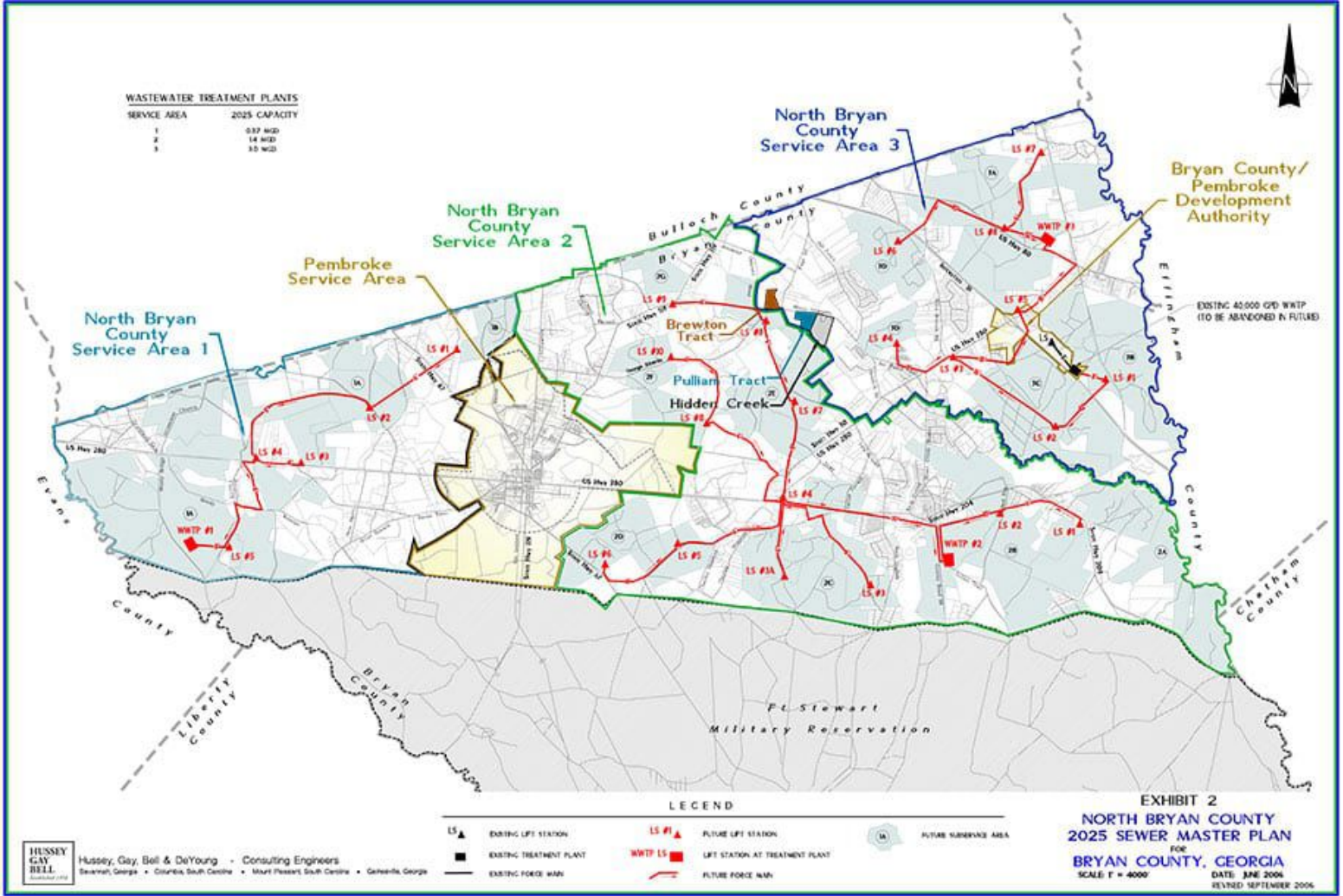
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<sup>6</sup> EPRD. At pgs 11-14.

## Attachment A

North Bryan County 2025 Master Sewer Plan

WASTEWATER TREATMENT PLANTS	
SERVICE AREA	2025 CAPACITY
1	0.37 MGD
2	14 MGD
3	10 MGD



LEGEND

- LS ▲ EXISTING LIFT STATION
- LS ▲ FUTURE LIFT STATION
- (A) FUTURE SUBSERVICE AREA
- EXISTING TREATMENT PLANT
- WWT LS ■ LIFT STATION AT TREATMENT PLANT
- EXISTING FORCE MAIN
- FUTURE FORCE MAIN

EXHIBIT 2  
**NORTH BRYAN COUNTY**  
**2025 SEWER MASTER PLAN**  
 FOR  
**BRYAN COUNTY, GEORGIA**  
 SCALE 1" = 4000'  
 DATE: JUNE 2004  
 REVISED: SEPTEMBER 2006

**HUSSEY GAY BELL**  
 Hussey, Gay, Bell & DeYoung - Consulting Engineers  
 Savannah, Georgia • Columbia, South Carolina • Mount Pleasant, South Carolina • Greenville, Georgia