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

December 4, 2023

Via E-Mail

Simon Hardt, Senior Regional Planner
Coastal Regional Commission of Georgia
shardt@crc.ga.gov

Re: Comments on DRIs # 4099 - Wyndham PUD - Pembroke

Dear Mr. Hardts:

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 its water quality and aquatic environments.

ORK's comments on the Wyndham Planned Unit Development (PUD) fall into three overarching categories. First, water supply to and wastewater management from this proposed PUD raises concerns that should be considered and addressed as early as possible. Second, the impacts that this development will have on wetlands, floodplains, and areas of significant natural resources are largely glossed over and should receive specific attention. Third, ORK offers some suggestions to the decision makers and developers for maximizing the benefits of the planned but undefined open space, green space, and recreational areas. ORK urges careful consideration of these topics prior to any rezoning, permitting, or construction decisions.

1. Water Supply and Wastewater Treatment

Both the water supply and wastewater treatment needs of any development in coastal Georgia must carefully consider its long-term impacts, implications, viability. Since at least 2006, Upper Floridan Aquifer (UFA) has received special protections from withdrawals and wastewater discharge due to decades of overutilization. With Bryan County and the City of Pembroke falling in one of the UFA management zones, permittees and decision makers should make a fully informed decision of the near- and long-term impacts and viability of this housing development in light of the additional strains it will place on groundwater resources. Likewise, wastewater treatment should take a long-term view and embrace a regional approach to respond to the areas anticipated and projected growth.

Any new water withdrawal demand should be carefully considered. Under the Georgia Department of Natural Resources' Coastal Georgia Water & Wastewater Permitting Plan for Managing Salt Water Intrusion (2006 Plan), the City of Pembroke and Bryan County fall in the "Yellow Zone" management area.¹ The 2006 Plan establishes withdrawal restrictions for this zone that include conservation and reuse considerations as well as a justification of need. Importantly, the 2006 Plan also limits all total permitted withdrawals in the Yellow Zone to approximately 20.3 million gallons per day (MGD). At a recent meeting, the Georgia Environmental Protection Division (GA EPD) noted that in 2022, the average annual permitted withdrawals for the Yellow Zone were 30.114 MGD, with a 2025 scheduled limit of 29.092 MGD. Continued overutilization of the UFA threatens to increase the rate of saltwater intrusion into the UFA, threatening the region's main drinking water supply. In light of the region's anticipated growth, demand and strain on the UFA will only increase if piecemeal permitting is used rather than a methodically considered approach. ORK urges local, regional, and state decision makers to take a regional, long-term, and holistic view of the water supply demand issue and develop comprehensive and sustainable solutions that will allow future generations to thrive throughout Georgia's northern coastal region.

Wastewater treatment must also be considered in the context of the quickly growing area where the Wyndham development is proposed. Ultimately, the City of Pembroke should strongly consider and begin pursuing a regional solution to its growing wastewater treatment needs. In its application, the Wyndham PUD alone will require treatment capacity for 0.229 MGD of wastewater. With applicant's plan to rely on the City of Pembroke to treat 229,000 gallons per day (GPD), this single project will use over 75% of the recently approved 300,000 GPD expansion at the Pembroke Water Pollution Control Plant (WPCP). With more growth expected in the region, the Pembroke WPCP will not be able to meet all of this anticipated demand. And as development continues and available land becomes more scarce, it will be more difficult to site and rely on a scattering of on-site treatment systems to address wastewater treatment capacity needs. The construction and operation of the nearby North Bryan Water Reclamation Facility presents an opportunity to address long-term wastewater treatment capacity needs in Pembroke and North Bryan County as a whole. ORK urges city, county, and state decision makers to take a regional view and approach to addressing growing treatment demands ahead of anticipated growth.

2. Wetlands, Floodplains, and Stormwater Management

Additional considerations and attention should be given to wetlands and floodplains specifically as well as managing stormwater more generally. As the area continues to develop and more impervious surfaces are placed on the landscape, stormwater management will become more important. Combined with the increasing frequency and intensity of storms, protecting the environmental services that wetlands are already providing and thoughtfully building with floodplains in mind is essential for the resiliency of this development, the City of Pembroke, and North Bryan County. ORK urges the developers, permittees, and decision makers to take a long-term and comprehensive approach to its stormwater management.

¹ Georgia Department of Natural Resources. "Coastal Georgia Water & Wastewater Permitting Plan for Managing Salt Water Intrusion" (2006 Plan). June 2006. *Available at:* https://www1.gadnr.org/cws/Documents/saltwater_management_plan_june2006.pdf

Fill and impacts to wetlands should be avoided at every opportunity. Wetlands provide a wide range of environmental services that benefit the residents of Bryan County and beyond, including flood control, pollution filtration, aquifer recharge, and recreation by providing habitat and forage to a variety of species. Despite their importance to the area, very little attention is paid to wetlands in the application materials. Beyond bare references on the included maps, next to nothing is said about wetlands. ORK urges the developers, permittees, and decision makers to keep in mind the important benefits of wetlands in all future decisions. Further, ORK asks that the wetlands be clearly delineated on future site plans, conceptual maps, and other documents to clearly show their presence and locations.

Wyndham's developers should also be conscious and very cautious of building within the floodplain that exists on the site. In the documents included with the DRI announcement, very little is mentioned about the floodplain other than the development is not "likely to affect" it. However, this is not clear from the conceptual plan or any other documents. In Georgia 'floodplain' is a commonly used shorthand for the "Special Flood Hazard Area," which is described as an "area of high flood risk that is inundated by the 1% annual flood chance."² This is the same definition that the Federal Emergency Management Agency uses for its Flood Hazard Zone A designation.³ Building in these areas not only presents a risk for those structures but creates potential issues for participation in the National Flood Insurance Program.

Additionally, on-site stormwater management should be as resilient as possible. As noted above, storms are becoming strong and more frequent. As such, demand on stormwater management systems will likewise increase. To reduce negative flooding and inundation impacts, the applicants should be forward-looking in the stormwater management. Preserving wetlands will help reduce these risks. Reducing impervious surfaces wherever possible to lower the projected 45% impervious surface coverage estimation will further help to slow water down and reduce flooding. Further, building stormwater ponds to process storms beyond the 25-year storm will help to lengthen their function lifetimes and futureproof stormwater management on site.

3. Open Space, Green Space, and Recreational Areas

In developing the Wyndham PUD, specific attention should be given to protecting and preserving the area's critical natural resources. The development should thoughtfully preserve the large amount of spaces designated as Areas of Significant natural resources in order to maximize these areas' positive benefits on the region and its residents through preserving its rural character, recreational activities, flood control, and ecological integrity. ORK asks the developers to proactively plan its open space, green space, and recreational areas.

While thoughtful open space, green space, and recreational areas can take many forms, ORK offers these suggestions for planning purposes. First, the existing wetlands and floodplains should be maintained for the reasons mentioned above. Second, other existing natural features should be maintained and be the starting point for further development. Finally, ORK suggests wherever possible that these open and green spaces are as contiguous as possible, avoiding a patchwork of smaller, less beneficial space.

² See GA EPD's 'Floodplain Management' webpage, available at: <https://epd.georgia.gov/watershed-protection-branch/floodplain-management>

³ See <https://www.fema.gov/glossary/zona>

4. Clarification of the 'Additional Information Requested'

As a brief note, ORK asks for more clarification about the additional information requested. In the application materials included in the notice, either the applicant or the Department of Community Affairs answered "Yes" to the question "Has the RDC identified any additional information required in order to proceed with the official regional review process?" However, in responding to the question "...has that additional information been provided to your RDC and, if applicable, GRTA?," the "(not selected)" option was chosen.⁴ ORK asks for clarification what additional information was requested by the RDC, whether the applicant has provided this information to the RDC and/or the GRTA, and if not, where the applicant is in that process.

Thank you in advance for your time and consideration; please let me know if you have any questions:
ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper

⁴ See <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4099>