



PO Box 16206  
Savannah, GA 31416  
Phone/Fax: 866-942-6222

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

April 16, 2024

**Via E-Mail**

Simon Hardt, Senior Regional Planner  
Coastal Regional Commission of Georgia  
[shardt@crc.ga.gov](mailto:shardt@crc.ga.gov)

**Re: Comments on DRI # 4170 - Southbound Timberland Tract - Bryan County**

Dear Mr. Hardt:

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 21 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. 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 Southbound Timberland Tract development fall into four categories. First, the wetlands and floodplain impacts from this development should be carefully considered, especially in the context of stormwater management. Second, the water supply and wastewater demand must be addressed and fully confirmed before any decisions are made. Third, there continues to be an unclear need for additional warehouse space in the region, calling into question the need for this development. Fourth, this DRI should consider the entirety of the warehouse development rather than splitting them into separate decision points to better understand the cumulative impacts. ORK asks that rezoning and construction decisions be delayed until these concerns are fully considered, understood, and addressed.

First, specific additional attention should be given to wetlands, floodplains, and managing stormwater. 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. The ~50% impervious surface cover anticipated by the project will increase stormwater management needs.

Likewise, the project's construction in both the 100-year<sup>1</sup> and 500-year<sup>2</sup> floodplains should be reconsidered and avoided as much as possible. As the area continues to develop and more impervious surfaces are placed on the landscape, stormwater management will become more important. Considering all this, combined with the increasing frequency and intensity of storms, protecting the environmental services that wetlands and floodplains are already providing and thoughtfully building with floodplains in mind is essential for the resiliency of this development and neighboring developments as well as North Bryan County. ORK urges the developers to consider reconfigurations that reduce wetland fill and construction within the floodplain to the maximum extent. Where artificial stormwater management facilities are planned, ORK urges the developers and the county to require that an 85% storm is capable of being retained.<sup>3</sup> Finally, ORK urges the permittees and decision makers to take a long-term and comprehensive approach to its stormwater management in this rapidly developing area.

Second, water supply and wastewater capacity must be firmly established prior to construction. Water supply continues to be a difficult issue in light of withdrawal restrictions established in Bryan County. The applicant's plans to rely on yet-to-be-permitted wells in Bulloch County leaves this site vulnerable to water supply issues if these wells are not permitted or cannot supply the needed 31,000 GPD of water supply. Further, the site's wastewater capacity also relies on yet-to-be-built service at either the North Bryan Water Reclamation Facility and/or through City of Savannah service lines. While this wastewater approach should be preferred over an on-site/septic system, the ability to actually utilize this larger wastewater system should be confirmed prior to rezoning and construction. ORK urges Bryan and Bulloch County permittees and decision makers to delay any rezoning or construction permitting decision until after the water supply wells intended for use by this project are fully permitted and the developer receives confirmation that it will receive its necessary supply. Likewise, ORK asks for a delay until wastewater capacity is confirmed to be available. Further, if decision makers approve this project, ORK urges that it does so only with conditions that no new water withdrawal wells or on-site/septic system be used to meet its water supply and wastewater capacity needs.

Third, the need for the 4.6 million square feet of additional warehouse space continues to be unclear as warehouse development continues at an unprecedented rate. Looking specifically at the Savannah-area warehousing market, vacancy rates are continuing to rise. As of 2023 Q4, the last with full data, the vacancy rate was 7.23%,<sup>4</sup> an increase from 2023 Q3's vacancy rate of 4.23%<sup>5</sup> and 2022 Q4's rate of less than 1%.<sup>6</sup> The latest increase was attributed to "several bulk spec deliveries." With many more speculative warehouse developments under construction, as well as new developments continuing to be proposed (including more than 3.2 million square feet at the neighboring Brooks Warnell property, 1.5 million more at Rockingham Farms,<sup>7</sup> and 2.6 million at the Williamson Tract,<sup>8</sup> among many others), this vacancy rate could continue to rise, making additional warehouse space that much less necessary and less

---

<sup>1</sup> Aka "1% Annual Chance Flood Hazard area"

<sup>2</sup> Aka "0.2% Annual Chance Flood Hazard area"

<sup>3</sup>As a reference point, the Savannah River Watershed Protection Area's 85th percentile storm equates to 1.16 inches of rainfall over a 24-hour storm.

See "Southern Lowcounty Stormwater Design Manual" at § 3.5.3. March 2023. Available at:

<https://www.beaufortcountysc.gov/stormwater/documents/Manuals--Plans-page/SoLoCo-Design-Manual-and-Appendices.pdf>.

<sup>4</sup> Colliers International. Q4 2023 | Savannah Industrial Market Report. See

<https://www.colliers.com/en/research/savannah/2023q4industrial>

<sup>5</sup> See <https://www.colliers.com/en/research/savannah/2023q3industrial>

<sup>6</sup> See <https://www.colliers.com/en/research/savannah/2022q4industrial>

<sup>7</sup> See <https://www.sas.usace.army.mil/Missions/Regulatory/Public-Notices/Article/3707452/sas-2024-00250-sp-sew/>

<sup>8</sup> See <https://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4169>

beneficial. ORK continues to question the actual need for these millions square feet of warehouse space amid an unclear and unproven need. ORK urges decision makers to carefully consider the need and benefit of these developments, especially in the context of negative environmental impacts that will result.

Fourth and finally, the impacts from this development should be considered as a whole rather than being split into multiple projects and considerations. This DRI review appears to only address the Bryan County rezoning. However, with a significant portion of the project taking place in Bulloch County, considerations of rezoning, construction, traffic, and land use will also need to be considered for that. Likewise, the cumulative impacts from both this development and the Brooks Warnell property development should be considered. These projects are not occurring in isolation and appear to be inextricably linked. As such, the impacts from just the Southbound Timberland tract development cannot be the only considerations made.

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).

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper