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[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 # 4169 - Williamson Tract**

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 Williamson Tract development falls into four categories. First, the property's immediate adjacency to the Ogeechee River and its associated wetlands demands specific attention. Second, stormwater management and floodplain management should be carefully considered as well. Third, the water supply and wastewater demand must be addressed and fully confirmed before any decisions are made. Fourth, there continues to be an unclear need for additional warehouse space in the region, calling into question the need for this development. Overall, this property location next to the Ogeechee River, its wetlands, and floodplain, the unconfirmed water and wastewater services, and the growing unclear need for more warehouse space make this development highly questionable. ORK urges Bryan County and all decision makers to not approve this development and to not rezone the property.

First, special consideration must be given to the Ogeechee River and its wetlands adjacent to the property. This includes full protection of those wetlands and important upland areas, the questionable location of the proposed property line, the implications of the conservation character area, and prevention of runoff into the wetlands and river. Despite the property's immediate adjacency to the Ogeechee River and its wetlands, very little is discussed about the impacts to wetlands beyond a bare acknowledgement that they are likely to be affected. No discussion of those likely impacts, what kind of wetlands are to be impacted, or what kind of permits will be required is included. The Zoning

Masterplan included in the DRI notice likewise fails to specify where wetlands are and how many acres will be impacted. It appears that wetlands may have been delineated, but without a map legend or further explanation, it is difficult to tell. ORK asks that these adjacent wetlands be clearly identified, delineated, and enumerated prior to any decision. If wetlands are determined to be jurisdictional under the U.S. Army Corps of Engineers, rezoning and construction should be withheld until all relevant permits are obtained.

Zoning, land use, and property delineation also have an important role to play in protecting the river and wetlands. The Williamson Tract appears to be included in the “Conservation” character area of Bryan County’s Comprehensive Plan, at least in part. Action items and goals for these areas include identifying and preserving environmentally sensitive areas as open spaces, prioritizing economic development related to quality of life amenities, promoting environmentally friendly development practices, and generally protecting natural resources.<sup>1</sup> While it is unclear whether the entirety of this property is included in this character area, these goals should guide any rezoning or permitting decisions. Of specific concern is the split-rezoning that the applicant seems to be proposing or pursuing, especially in light of the Conservation character area’s goals. The “proposed property line” included in the Zoning Masterplan appears to bisect wetlands. To preserve these sensitive natural resources, the industrial portion of this property should, first, not include any wetlands and, second, utilize the best available design and management principles to fully ensure that the construction and long-term operations on the industrial portion of the property does create any adverse effects to the Ogeechee River, wetlands, or the wildlife and recreation they support. Specific special conditions to achieve these goals will likely be necessary if this development is approved.

Overall, ORK first asks that the character of this area be clearly defined. Second, ORK asks that any split-rezoning follows conservation-minded boundaries, such as excluding all wetlands from an industrially-zoned area. Third, ORK urges decision makers to ensure the highest degree of environmentally friendly development practices are used in designing, engineering, and constructing if rezoning and construction are ultimately approved.

Second, stormwater management and floodplain impacts deserve deeper consideration due to property’s location next to the Ogeechee River and large amounts of wetlands. Due to the sensitivity of these natural resource and recreation areas, stormwater management should be carefully considered. With around 65% of the development to be covered by impervious surfaces, stormwater runoff from this industrial site is a significant concern. The site’s location within both the 100-year<sup>2</sup> and 500-year<sup>3</sup> floodplains raises these runoff concerns further, as flooding is more likely to occur in these areas as storm frequency and intensity is expected to increase.

ORK raises these concerns and makes the following suggestions to address stormwater runoff. First, any stormwater management facilities, like detention ponds, should be properly located. The proposed locations immediately adjacent to wetlands is not ideal, as this increases the likelihood of incidental runoff during heavy storms or flooding events. These should be relocated further away from existing wetlands and outside of either the 100-year or 500-year floodplains. Second, any stormwater management facilities should be constructed well above the minimum requirements described by Bryan County and the Georgia EPD. Both the property’s location and the expected increasing

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<sup>1</sup> Bryan County Comprehensive Plan 2023 Update. At pages 76-78. Available at - <https://www.bryancountyga.gov/home/showpublisheddocument/12922/638328055705270000>

<sup>2</sup> Aka “1% Annual Chance Flood Hazard area”

<sup>3</sup> Aka “0.2% Annual Chance Flood Hazard area”

intensity of storms should be considered. To address this, ORK urges the county to require that an 85% storm is capable of being retained.<sup>4</sup> Third, the designs and construction should ensure that all stormwater from the industrial property remains on that portion of the property, preventing any runoff into the Conservation character area, wetlands, and the river. Fourth, impervious surfaces should be reduced as much as possible to mitigate runoff and allow for natural infiltration. Fifth, no structures should be constructed within the 100-year or 500-year floodplain.

Third, 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 simple statement that there is sufficient water supply capacity without further explanation is not reassuring amid these withdrawal restrictions, the need for new supply wells, and water supply issues at other warehouse and residential developments. More explanations and assurances are necessary in the water supply context. Further, the site's wastewater capacity 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 the decision makers to delay approving this rezoning and the following construction activity until water supply capacity and wastewater capacity is confirmed to be available. Further, if decision makers approve this project, ORK urges 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.

Fourth and finally, the need for the 2.6 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>5</sup> an increase from 2023 Q3's vacancy rate of 4.23%<sup>6</sup> and 2022 Q4's rate of less than 1%.<sup>7</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>8</sup> and 4.6 million at the Southbound Timberland Tract,<sup>9</sup> among many others), this vacancy rate could continue to rise, making additional warehouse space that much less necessary and less 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.

Overall, this site may ultimately not be the best situated for this type of development. Its close proximity to the river, wetlands, and the recreation and wildlife they support raise some serious concerns. Stormwater runoff into these sensitive areas is a significant concern in light of flooding and intense storms. Reconfiguring the site, reducing the size

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<sup>4</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>5</sup> Colliers International. Q4 2023 | Savannah Industrial Market Report. See

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

<sup>6</sup> See <https://www.colliers.com/en/research/savannah/2023q3industrial>

<sup>7</sup> See <https://www.colliers.com/en/research/savannah/2022q4industrial>

<sup>8</sup> See <https://www.sas.usace.army.mil/Missions/Regulatory/Public-Notices/Article/3707452/sas-2024-00250-sp-sew/>

<sup>9</sup> See <https://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4169>

of the proposed structures and impervious surface, and requiring additional design, construction, and operation conditions are likely necessary to prevent these impacts. And when considering the unclear need for additional warehouse space, the development may not be necessary at all. ORK strongly urges Bryan County to consider this in its ultimate decisions.

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