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

January 21, 2025

**Via E-Mail**

Caity McKee, Senior Planner  
Coastal Regional Commission of Georgia  
[cmckee@crc.ga.gov](mailto:cmckee@crc.ga.gov)

**Re: Comments on DRI #4353 - Old Register Road PUD - Bulloch County**

Dear Ms. McKee:

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 Old Register Road Planned Unit Development (PUD) fall into two categories. First, wetlands, stream, and floodplain preservation is important for preserving the area's environmental function. Second, stormwater management should take a long-term view of resiliency to reduce increasing risks of flooding. ORK urges the City of Statesboro careful consideration of these topics at this early stage of development to ensure the long-term health of the community.

1. Wetlands, stream, and floodplain preservation

Whenever this tract is developed, the flow of water on the site should be central in refining the ultimate design, plat map, and construction plan for this development. A significant portion of the property hosts wetlands. A tributary stream to Little Lotts Creek also appears to cross the property, creating a pond in the center of the property. These existing aquatic features, as well as future expansions of floodplain designations, should be a top consideration when determining layout and siting of houses and other structures.

The Conceptual Master Plan poorly represents and fails to sufficiently protect the wetlands present on the property. While no exact number is given, at least 25 acres of wetlands and another three acres of freshwater pond exist on the property. However, without clear delineation, enumeration, and communication from the applicants, the exact number of total wetlands acres present and anticipated to be impacted is unclear. ORK asks that the public and the City of Statesboro's decision makers are provided a readable and usable map prior to any decisions being made.

Statesboro should seek a separate wetlands plan from the developers. Failing to delineate and enumerate the wetlands present on the site obscures the actual impact that this development will have on the property's existing aquatic features and appears to show the developers lack of sufficient consideration of these wetlands in their planning. To address this apparent oversight, ORK asks the City of Statesboro to condition its approval of any rezoning or construction on the developers' submission of an adequately descriptive wetlands plan that, at minimum, (1) clearly delineates all of the wetlands present on the property and enumerates the acreage proposed to be filled and preserved, (2) prioritizes and details how the development preserves the wetlands present on the site, (3) adjusts the Conceptual Master Plan, site layout, and future plat maps to avoid wetland fill wherever possible, and (4) mitigates any lost wetlands with on-site mitigation or restoration efforts as close to the site as possible to reduce localized impacts.

Flooding is an increasing concern for any development in the region. As storm frequency and intensity is expected to increase in the coming decades, the risk of flooding will likewise increase, multiplying the likelihood and potential damage from flooding events.<sup>1</sup> With this increasing risk, developers and the City of Statesboro must be acutely aware not only of current floodplain locations but other potential areas vulnerable to flooding risk. ORK urges forward-looking layout and siting plans that anticipate expanding flood risk and floodplains.

The Old Register Road property appears potentially vulnerable to increasing flooding risks. A tributary stream to Little Lotts Creek, as well as the wetlands and pond it feeds, bisect the property. As such, these aquatic features should be the centerpiece around which all structures are built. The stream, pond, and wetlands represent the existing path of water flow on the site. While these areas are not designated as FEMA flood zones according to historic data, stormwater from stronger and more intense rainfall events will naturally flow through these waterbodies. To reduce flood risk, an adequate buffer should be placed between the water feature and any structure. This buffer contributes to the resiliency of the neighborhood into the future, especially for the multifamily homes and townhomes proposed in the conceptual plan.

Beyond the tributary stream, the southern-most corner of the property should receive additional attention. This portion of the property is located within the existing "Zone A" flood zone designation, also known as the "100-year" floodplain. Over a 30-year period, the flood risk is 26%<sup>2</sup> - more than a 1 in 4 chance - in the 100-year floodplain. As such, the development should avoid all construction in Zone A areas. In light of strengthening storms, the City of Statesboro should require the site developers to create a science-based report assessing what areas of the property are vulnerable to flooding and potential candidates for an expanded flood zone designation. This would likely expand what is considered a Zone A area in the southern corner of the property, but should look at the entire property. Of particular

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<sup>1</sup> Savannah Morning News. "Dawdling Debby's Savannah stay follows trend of slow, increasingly wet tropical storms." August 16, 2024. Available at: <https://www.savannahnow.com/story/weather/severe/2024/08/16/debbys-georgia-stall-follows-a-tropical-storm-trend-experts-say/74815549007/>

<sup>2</sup> See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

concern is the proposed fire station location, which is either currently in the Zone A 100-year floodplain or will likely be included in a future expanded designation.

In summary, ORK asks that the City of Statesboro:

- Requires the developers to create a wetlands plan that clearly delineates their location, prioritizes wetlands preservation, adjusts the site layout to avoid wetland fill, and mitigates wetland loss,
- Does not allow construction within the existing 100-year floodplain, with specific attention to the fire station,
- Requires the developers to create a report of expanded flood risk, and
- Establish a buffer from existing water features and floodplains to increase the property's resiliency.

## 2. Require Forward-Looking Stormwater Management for Growing Management Demand

On-site stormwater management should be built as resilient as possible. As noted above, storms are becoming stronger and more frequent. This, combined with additional impervious surface cover on the properties, will increase stormwater management demand in the area. To reduce negative flooding impacts, the developers should work to reduce pressure where possible. Reducing impervious surface coverage, utilizing green infrastructure, constructing retention features well above minimum requirements, and preserving wetlands wherever possible will help to reduce this pressure.

First, the developers should reduce additional stormwater pressure that will result from this project. This increased pressure will principally come from increased impervious surface cover and wetlands filling. Impervious, hard surfaces speed up stormwater runoff and prevent absorption into the ground, straining stormwater management infrastructure and increasing the risk of flooding. The estimated 65% impervious surface cover on the site is extremely concerning and threatens to add to flood risks on the property. Grading and paving should be avoided wherever possible to reduce this 65% coverage number. Pervious pavement<sup>3</sup> should be utilized where possible to allow for more absorption. Likewise, other green infrastructure<sup>4</sup> like bioswales<sup>5</sup> should be used to further control stormwater. Further, wetlands preservation should be a top priority for stormwater management and flood control. Filling or destroying wetlands removes these naturally absorbent water features and the free flood control they provide. Preventing these additional stormwater pressures will help to reduce flood risks.

Further, ORK urges the City of Statesboro to require the developers to go beyond the minimum required standards for stormwater management infrastructure. In such a low-lying area, increased stormwater pressure can quickly lead to flooding issues on the proposed PUD property and onto neighboring properties. And with storms becoming more frequent, previous stormwater processing calculations are less intense than the retention ponds will likely be required to retain and process. To extend the functional lifetime of these retention ponds and to successfully

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<sup>3</sup> National Association of City Transportation Officials. "Pervious Pavement."

<https://nacto.org/publication/urban-street-design-guide/street-design-elements/stormwater-management/pervious-pavement/>

<sup>4</sup> U.S. EPA "Why You Should Consider Green Stormwater Infrastructure for Your Community."

<https://www.epa.gov/C3/why-you-should-consider-green-stormwater-infrastructure-your-community>

<sup>5</sup> National Association of City Transportation Officials. "Bioswales."

<https://nacto.org/publication/urban-street-design-guide/street-design-elements/stormwater-management/bioswales/>

prevent flooding, ORK urges developers and decision makers to go beyond minimum standards in constructing these stormwater features.

The City of Statesboro should take into account historic and future storm frequency and intensity when calculating stormwater demand and retention pond construction. ORK suggests basing management and construction on the 100-year and/or 500-year storms. Like with floods, these estimates are based on the likelihood of these storms occurring. Currently, the Savannah area's 100-year storm would add 10 inches of rain in a 24-hour period, with the 500-year storm raining 20 inches in 24 hours.<sup>6</sup> In Statesboro, those numbers are 8.97 inches and 12 inches over a 24-hour period for the 100 and 500 year storms.<sup>7</sup> It is important to note that these storms are understood to be smaller than recent data show and future estimates predict, as the current NOAA calculations are based on 2016 data.<sup>8</sup> To extend the functional life of these features in protecting the area from flooding, ORK urges the City of Statesboro to require stormwater features to retain 125% of the 100-year storm<sup>9</sup> or 100% of the 500-year storm.

In summary, ORK asks that the City of Statesboro:

- Ensure stormwater management plans are forward-looking and ensure long-term resilience
- Required impervious surface cover be reduced as much as possible to reduce increased stormwater pressure coming from the site,
- Prioritizes the use of green infrastructure, such as pervious pavement and bioswales, are in construction plans,
- Preserves existing wetlands to ensure their continued role in natural, cost-free stormwater management,
- Ensures resilient stormwater infrastructure is built to future needs and conditions, and
- Requires artificial stormwater management structure, such as retention ponds, to be built to process either 125% of the 100-year storm or 100% of the 500-year storm,

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

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<sup>6</sup> See Question 16 at <https://www.savannahga.gov/FAQ.aspx?QID=307>.

<sup>7</sup> NOAA Atlas 14 Point Precipitation Frequency Estimates. Available at: [https://hdsc.nws.noaa.gov/pfds/pfds\\_map\\_cont.html?bkmrk=ga](https://hdsc.nws.noaa.gov/pfds/pfds_map_cont.html?bkmrk=ga).

<sup>8</sup> See UGA

[\(https://site.extension.uga.edu/climate/2020/05/has-the-100-year-storm-changed-over-time-it-may-depend-on-where-you-are/\)](https://site.extension.uga.edu/climate/2020/05/has-the-100-year-storm-changed-over-time-it-may-depend-on-where-you-are/) and Dudek Consultants (<https://dudek.com/will-your-flood-control-system-work-in-a-100-year-event/>).

<sup>9</sup> 125% of a 9.98-in storm is 12.4675 in.