



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*

August 1, 2025

**Via E-Mail**

Coastal Regional Commission  
[planning@crc.ga.gov](mailto:planning@crc.ga.gov)  
912-514-1593

**Re: Comments on DRI #4505 - Waterford Subdivision**

To whom it may concern:

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 20 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 Waterford Subdivision fall into three overarching categories. First, the wetlands preservation should be a central planning factor for this site. Second, stormwater management and flood damage prevention should take a long-term view. Third, wastewater management should utilize centralized infrastructure and should prevent on-site management options. ORK urges careful consideration of these topics prior to any rezoning, permitting, or construction permission decisions from the City of Brooklet.

1. Wetlands - preservation and sketch layout

Wetlands are a quickly-dwindling resource throughout Bulloch County and coastal Georgia that necessitate additional attention in this and every development. The Sketch/Master Plan included in the DRI notice fails to delineate, highlight, or enumerate the wetlands present on the site. ORK urges the City of Brooklet to require the developers to develop a Wetlands Plan to reduce any loss or impacts to these resources.

Wetlands provide important ecological services that are difficult and expensive to replicate. A one acre wetland, one foot deep, can hold approximately 330,000 gallons of water,<sup>1</sup> at the simple and low cost of avoiding fill and preserving the wetlands. In addition to these free stormwater and flood control services, wetlands provide pollution filtration and water quality improvement function, provide habitat for wildlife, and support a healthy ecological balance in the area. Preservation of these important and free services is important, as replacing any one of these functions is expensive, difficult, and not guaranteed to succeed. Wetlands preservation should be a primary goal of this and any large development.

It should be noted that wetlands provide these services regardless of their regulatory definition. Whether the wetlands are designated “jurisdictional” or “non-jurisdictional” provides no assessment of the services they provide. This distinction simply indicates whether federal laws apply to the wetlands. Both jurisdictional and non-jurisdictional wetlands are important aquatic and ecological resources that provide vital functions to the human and natural environments, and their protection should be prioritized.

Additional analysis and consideration should be put into the significant wetlands on the site. First, any **preparatory actions or construction should be delayed** and conditioned on the developers first considering, analyzing, and providing a **robust wetlands plan**. This should include not only the total number of wetlands impacted by the structures, but where impacts to wetlands are anticipated by all necessary and anticipated construction, including but not limited to housing units and road construction. Beyond this, the wetlands plan should justify why the total amount of wetlands fill is necessary and describe the efforts made to reduce wetlands fill where possible. In addition, the City of Brooklet should consider requiring **wetland mitigation projects** to reduce the damages from any filled wetlands. These projects should be prioritized to occur onsite, if possible, or as close to the site as possible if onsite mitigation cannot occur. This ensures that the local area, which would lose the wetlands and their environmental services, will see the benefits of the wetlands mitigation projects.

In summary, ORK asks that:

- Wetlands preservation should be prioritized and received a more detailed analysis;
- No preparatory action or construction activities occur until all required permits are obtained;
- A robust wetlands plan clearly lays out and justifies where, why, and how many acres of wetlands are being proposed to be filled; and
- Mitigation projects are required either onsite or as close to the site as possible.

## 2. Flooding and stormwater management - long-term vision needed

Resilient planning, design, and construction is an increasingly important consideration in all developments throughout Brooklet and Bulloch County. Significant storm events are becoming both stronger and more frequent. As a result of these strengthening storms, flooding is becoming a more frequent and significant problem throughout the City and County. Regional development, which adds impervious surface and removes the assimilative capacity of wetlands, only adds to stormwater management and flooding pressure. To ensure this site will remain usable in the

---

<sup>1</sup> Purdue University School of Agriculture. <https://www.extension.purdue.edu/extmedia/wq/wq-10.html>

coming years and decades, and **does not become a burden to future owners, neighbors, and local governments**, the City of Brooklet should require long-term, resilient planning, design, and construction at this crucial first stage of development.

Based on the information included in the DRI notice and documents, there does not appear to be any critical consideration of site-specific stormwater management needs to prevent flood damage. Compliance with state and local standards are the absolute minimum and should only be the starting point of stormwater management considerations.

While there are not currently any floodplains designated on these parcels, the City of Brooklet should be proactive in its stormwater management and flood damage prevention requirements at this development. The currently designated floodplains in the area are backwards-looking, as they rely on historic data only. The data these maps are made with are **based on historic weather patterns that no longer exist in the area, leaving out the most recent and representative data**. In addition, FEMA's flood maps for this area were last updated in 2010.<sup>2</sup> In the intervening 15 years of data, it is likely that the floodplains in the area have shifted. As rain events become stronger and more frequent, the floodplain will expand, representing an increase and expansion of flood risk into previously less-risky areas. As such, the City of Brooklet should be cautious in relying solely on these maps and should consider how more frequent and intense storms have impacted flood risks in the area.

As an example, ORK urges caution in building around the riverine features on the southern portion of the site. As shown in the Areas Requiring Special Attention (ARSA) Map, there appears to be a river that runs roughly north-south through the southern portion of the property. This indicates that water, including storm and flood waters, naturally flow in this direction. This is certainly a candidate for where floodplain maps could be expanded based on improved data. As such, ORK strongly urges the City of Brooklet and the developers to avoid construction near this feature to ensure future owners are not exposed to unnecessary and dangerous flood risks.

To better prepare for intensifying and more frequent storming and flooding, stormwater and flood damage prevention designs should go beyond the required minimums. First, **wetlands should be preserved** wherever possible. Second, the development should be conditioned on **reducing post-construction runoff**, rather than just ensuring no additional runoff compared to pre-construction amounts. This will help to 'bank' assimilation capacity to better offset stormwater pressure from stronger storms. Third, the **stormwater retention/detention ponds' capacity** should be increased. As one of the main mechanisms to control post-construction runoff, these ponds capacities are important. In anticipation of increasing storm strength, requiring these ponds to be able to assimilate 125% of the 100-year storm<sup>3</sup> or 100% of the 500-year storm, further banking capacity to respond to increasing storm intensities and frequencies. Fifth, to reduce stormwater management pressure, **impervious surface cover should be reduced** wherever possible. This can be achieved through actual reduction in cover, through the use of pervious pavement, or in any other proven way. Sixth, to respond to expanding floodplains, the City should **implement a floodplain buffer**, such as a 25-ft buffer from the edge of the 100-year floodplain or any water courses without a currently-designated floodplain. Building a buffer into the development process ensures that, as storms strengthen and floodplains are revised, flooding risk will not increase

---

<sup>2</sup> FEMA Flood Map Service Center. Flood Map 13031C0217D, effective 8/5/2010. See <https://msc.fema.gov/portal/search?AddressQuery=statesboro%2C%20georgia>

<sup>3</sup> 125% of a 10 inch storm is 12.5 inches. <https://www.savannahga.gov/FAQ.aspx?QID=329>

for structures. Through these suggested requirements, the City of Brooklet will ensure that this site remains resilient to future floods, not just to current flooding conditions.

In summary, ORK asks that:

- Flooding and stormwater management receives proactive attention to account for a lag in data and increasingly strong and frequent storm events;
- No structures are built near existing water courses and to create a buffer in anticipation of future floodplain expansion;
- Post-construction stormwater runoff is reduced compared to pre-construction numbers, whether through reductions in impervious surface coverage or any other method; and
- Stormwater retention/detention ponds' minimum capacity is increased beyond the current minimums.

### 3. Wastewater Management - prevent on-site management facilities

Ogeechee Riverkeeper is relieved to see that wastewater management will occur through interconnection into Brooklet's sewer system. Centralized wastewater treatment is the best management option for this and future developments. However, ORK urges the City of Brooklet to include a condition that ensures the development cannot utilize on-site wastewater treatment facilities at any time in the future.

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. On-site septic, land application systems, and "package" treatment plants<sup>4</sup> all present expensive and long-term maintenance concerns for relatively small amounts of treatment. Likewise, these options also create potential long-term water quality and pollution concerns. The construction and operation of the North Bryan Water Reclamation Facility presents an opportunity to address long-term wastewater treatment capacity needs, should Brooklet's treatment capacity become an issue. ORK urges the City of Brooklet, along with other city, municipal, county, and state decision makers to take a regional view and approach to addressing growing treatment demands ahead of anticipated growth. Further, ORK urges the City of Brooklet to avoid any reliance on septic systems or package plants to meet treatment demand in order to avoid future remediation for failing or aged-out systems.

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

---

<sup>4</sup> EPA. "Wastewater Technology Fact Sheet - Package Plants." Sept. 2000. Available at: [https://www3.epa.gov/npdes/pubs/package\\_plant.pdf](https://www3.epa.gov/npdes/pubs/package_plant.pdf)