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

September 16, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4813 - Blitchton Village

Coastal Regional Commission and Bryan County:

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 in the watershed that could pose a threat to its water quality and aquatic environments.

ORK's main concern with the proposed **Blitchton Village** development plans relate flooding and stormwater control, highlighted by the floodplains, wetlands, and Miles Branch located on the property. In addition, ORK seeks clarification on the questions of water supply and wastewater treatment for the proposed development. Until these questions are satisfactorial answered, ORK asks Bryan County to delay or deny the requested rezoning and any accompanying approvals.

1. Current and future flood risk should guide Bryan County's decision making and approvals

Site selection, layout, and the county's decisions need to thoroughly consider and respond to flood risks caused by stormwaters. Flooding is a serious concern throughout the low country and Bryan County, and on this site as well. The floodplains and wetlands on this property show that waters tend to flow across this property. Miles Branch's presence further highlights this, increasing the likelihood and severity of flooding events. Serious and specific attention must be paid to address these concerns. Until and unless these concerns are specifically addressed for this development, ORK has concerns about the long-term flood risks on this site.

Flood risks are growing in scope and severity. The CRC's Flood Zone Map shows a large portion of the proposed development is located in the Federal Emergency Management Agency's (FEMA) Zone A or AE, designated as a 1% Annual Chance Flood Hazard area and also known as the 100-year floodplain. While the "100-year floodplain" name

implies that floods will only occur once every 100 years, this obscures the actual risk. **Over 30 years, the actual flood risk is 26%[1] - a more than 1 in 4 chance for properties in the 100-year floodplain**.

Further, the "100-year floodplain" looks narrowly only at the "base flood," which is the strength of a flood that is 1% likely to happen in any year. **Non-base floods**, *i.e.* floods less strong or severe than the base flood (aka the "100-year flood") **are more likely to happen each year**. Likewise, the 100-year flood is not the absolute strongest possible flood that the property could face. The narrow focus on the 100-year flood not only undercounts the potential frequency of flooding on the property, but also fails to consider the severity of flood the property could experience.

Additionally, reliance on the backwards-looking 100-year flood model obscures future risk. The flood and geographic floodplains **estimates rely on historic data, leaving out the most recent and most representative data**. The FEMA flood maps for this site were last approved in 2014[2] - more than 12 years ago. As storm events become stronger and more frequent, the base flood will also become stronger and have a greater reach. Because flooding is anticipated to become more frequent and has been occurring in non-floodplain locations, to prevent unnecessary risks from flooding, ORK urges Bryan County to **prevent any structure from being built in the 100-year floodplain**.

These flooding concerns should be taken seriously and be proactively addressed now, before any decision is made. First, the site layout should avoid the current boundaries of the Zone A and AE flood zones. While the current layout *may* achieve this, it is difficult to compare the maps. ORK suggests that Bryan County request that the developers provide a map with the flood zones overlaid on the proposed layout. Second, the County should build-in long-term flood resilience into the site layout. Floodplain dimensions change, especially as storm frequency and intensity increase. Zone X areas should also not be built in. Likewise, an additional minimum 25-foot buffer should be placed at the borders of all flood zones - A, AE, and X - to account for future flood zone expansion. These additional protections in site layout will help to ensure the future Bryan County residents who make their homes in this development face greatly reduced flood risks.

Bryan County should also consider the foreseeable flood-related financial burdens to residents and homeowners. If these structures are built, it is with the assumption that they will be occupied by someone. If these structures are built in the 100-year floodplain, Bryan County is stating, unavoidably, it is in favor and onboard with its future residents and businesses bearing that flood risk - a 26% chance of facing the 100-year flood over 30 years. The risks to future businesses, residents, and homeowners increase when considering less severe but equally damaging "non-base" floods. Flooding will impact structures built in floodplains - it is a question of when, not if. Ogeechee Riverkeeper sees the seriousness of flood risks that come with building within floodplains and urges Bryan County to see the same.

Finally, Bryan County should also understand the **financial risks from flooding** it takes on from approving this project in a flood-prone area. By approving this development, Bryan County's taxpayers would be responsible for the City's flooding responses. This includes direct response costs related to rescues and other emergency services, debris

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[1] *See* https://savannahga.gov/FAQ.aspx?QID=332 and https://www.floodsmart.gov/flood-zones-and-maps

[2] FEMA Flood Map Service Center. https://msc.fema.gov/portal/search?AddressQuery=4747%20US-80%2C%20Ellabell%2C%20GA%2031308. Address used - Blitchton Station: Bryan County Fire Dept (Station # 4), 4747 US-80, Ellabell, GA 31308.

clean-up, and condemnation-related costs from flood-damaged houses, among others. It also includes property buyouts. For frequently-flooded properties, FEMA may offer buyouts to property owners, in hopes of avoiding insurance payouts and allowing the property to return to its pre-development conditions. These buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government[3] - a cost that Bryan County's taxpayers could be expected to fund. When considering whether this project is a net positive for Bryan County and its residents, the County must also consider these costs.

Before approving this project, Bryan County should be able to answer:

- Are any structures proposed to be built in the current '100-year floodplain'?
- Are future flood risks sufficiently considered and prevented by the proposed layout?
- Have alternative site layout plans been presented and reviewed?
- Could another acceptable site layout further reduce flood risks for future residents? Could additional floodplain buffers be added to reduce that risk?
- Will the eventually-approved site layout create acceptable flood risks for future generations of Bryan County residents?
- Is Bryan County comfortable using taxpayer funds to pay property future FEMA buyout costs?

2. Stormwater management should build in long-term resilience, including wetland preservation

Stormwater management is important for any development in Bryan County, but is particularly important in flood-prone areas. As noted above, the Special Flood Hazard Areas on the property necessitate careful consideration of how stormwater will be managed. As storms will intensify and occur more frequently in the coming years and decades, stormwater management will only become more important. As such, preservation of natural stormwater management, reduction to artificial and constructed stormwater intensifiers, and long-term resilience.

Stormwater management planning as reflected in the DRI notice and associated materials are inadequate. Discussion of stormwater management is limited to reducing post-construction impervious surface coverage through detention ponds. This is not enough, even at this early stage. Now is the time to consider flooding and how stormwaters will be managed on the property. Not centering these fundamental considerations now threatens to make them afterthoughts. Proactive planning and concrete proposals should be discussed before annexation occurs.

Wetlands - natural and no-cost stormwater management - should be preserved throughout the property. These quickly-dwindling resources not only reduce stormwater flows, they retain water volumes, filter pollutants, and provide natural habitats for the region's fish and wildlife. All of these ecosystem services are invaluable and are freely available - so long as Bryan County and other governmental bodies and regulators do not allow developers to fill the wetlands and build atop them. When wetlands are filled, these services are lost and either have to be replaced with expensive and less effective artificial options or are not replaced and harm our shared places and natural resources.

[3] https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event

It is important to note that wetlands provide these services regardless of their jurisdictional determination. Whether designated as "jurisdictional" or "non-jurisdictional" by the U.S. Army Corps of Engineers, **all wetlands provide all the ecological services** noted above, including stormwater management, and more. Bryan County should pay attention to the jurisdictional determination only to see if federal permitting is required and should not assign value based solely on that determination.

Further, Bryan County should seek clarification from the applicant on the question of wetlands impact by requiring the applicants to develop a separate wetlands plan. 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. Failure to include wetland location on the Concept Plan shows the applicant's lack of sufficient consideration of these wetlands in their planning. To address this apparent oversight, ORK asks Bryan County to request the applicant to create a 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 Concept Plan and site layout 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.

Impervious surface coverage reduction should be the second step in reducing stormwater management pressure. Based on the applicant's estimate of 45% impervious surface coverage of the approximately 66 acre site, this proposal will create approximately **29.7 acres of new impervious surface**. These hard surfaces, like concrete and asphalt, prevent stormwater from infiltrating into the ground, where they can be absorbed. Impervious surfaces also speed up stormwaters, adding to management pressure. Finally, impervious surfaces hold pollutants and allow them to be washed into nearby waterways if not properly captured or treated. To reduce these issues, a significant reduction in impervious surfaces should be prioritized.

Following wetland preservation and impervious surface reductions, the developers should be required to build resilient and long-term stormwater retention/detention structures. To better prepare for intensifying and more frequent storming and flooding, stormwater and flood damage prevention designs should go beyond the required minimums. First, 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 offset stormwater pressure from stronger storms. Second, **increasing 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 retain and assimilate 125% of the 100-year storm or 100% of the 500-year storm. Third, echoing suggestions from above, Bryan County should **implement a floodplain buffer**, such as a 25-ft buffer from the edge of current Special Flood Hazard Area boundaries. Building a buffer into the development process ensures that, as storms strengthen and floodplains are revised, flooding risk will not increase for structures. Through these suggested requirements, Bryan County will help to ensure that this site remains resilient to future floods, not just to current flooding conditions.

Finally, Bryan County should be aware of the additional risks that Miles Branch's presence on the site creates. Riverine flooding is likely and adds additional flooding pressure. Rather than solely rain-based flooding, riverine flooding persists much longer. River-based flooding continues until river levels return to pre-flood levels. Rather than

infiltrating the ground, rivers collect much more water and take longer times to disperse that collected water. Traditional stormwater management features, such as the proposed wet pond detention, cannot function as intended when fully inundated by riverine flooding. As such, Bryan County should ensure that the developers have fully considered and addressed the risks of riverine flooding in their stormwater management designs and facilities. The location within the 100-year floodplain and directly adjacent to a river calls for designs well above the minimum requirement.

Before approving this project, Bryan County should be able to answer:

- Are the proposed stormwater management features sufficient to protect the site for the entire life of the development?
- Where are wetlands currently located on the site and will any wetlands be filled by the proposed development?
- If wetlands are going to be filled:
    - Are the fillings unavoidable? Or can an alternative layout prevent the filling?
    - Do the proposed stormwater control features fully replace the free ecological services that the wetlands are currently providing?
    - Will the County be required to deal with any off-site impacts from the lost wetlands?
- Will a developer-provided wetlands plan help the County to make a more-informed decision?
- Can impervious surface coverage be reduced?
- Can additional stormwater management conditions be added, above current minimums, to help reduce flood risks for future generations of residents?
- Will the proposed stormwater management structures be able to effectively handle river-based flooding related to Miles Branch?

3. Water supply and wastewater treatment

ORK also seeks clarification on water supply and wastewater treatment plans.

- How did the developer reach its water demand estimates? Currently, the estimate is between 233-262 gpd per housing unit (depending on the 267-300 units estimated).
    - The Barrington Ferry PUD DRI estimates a 300 gpd per unit (0.135MGD for 450 units). Why is there a 38-67 gallons/day difference?
- What will be the source of the water supply? Treated surface water or groundwater?
- Where will the wastewater be treated? At the North Bryan Water Reclamation Facility?

Thank you in advance for your time and consideration; please let me know if you have any questions or would like to talk further on these topics: ben@ogeecheeriverkeeper.org.

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Ogeechee Riverkeeper