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

October 12, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4758 - Warner Tract Industrial

Coastal Regional Commission, Bryan County, and Bulloch 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 comments on the Warner Tract Industrial development fall into two main categories. First, the current conditions on the site make it very poorly suited for the proposed development. The floodplains and wetlands present on the properties highlight the site's propensity for flooding, which will be exacerbated by the proposed development. Second, ORK is concerned about the actual need for this project, as millions of square feet of warehouse space is currently vacant. Ogeechee Riverkeeper strongly urges Bryan County and Bulloch County to reject this requested rezoning based on these concerns.

1. The site's natural and aquatic features present flooding risks and make it a poor location for this development

Stormwater management is important for any development in the low country. As storms will intensify and occur more frequently in the coming years and decades, stormwater management will only become more important. As such, a site's existing natural condition must instruct whether a development is feasible and guide how stormwater will be managed, including the preservation of natural stormwater management, reduction to artificial and constructed stormwater intensifiers, building in long-term resilience, and avoiding construction in hazardous areas.

This site is vulnerable to flooding and stormwater management issues. FEMA-designated Zone A and AE Special Flood Hazard Area (aka the 100-year floodplain) dominates the site. The significant acreage of wetlands present of the site further indicates the prevalence of water flowing on and through the site. As proposed, the site layout does

not, and likely cannot, escape the present flooding vulnerabilities. As such, ORK urges Bryan and Bulloch counties to deny this rezoning and to not permit this project due to the flood hazards and associated risks.

If the project is to proceed, ORK urges Bryan and Bulloch counties to fully consider present conditions as well as future risks and require a significant redesign and reduction of the build-out to avoid current flooding risk and reduce additional flood risk from the construction. In addition, preserving already-existing natural flood controls and requiring additional stormwater control capacity should be considered and added as a condition.

Wetlands - natural and no-cost stormwater management - should be preserved throughout the properties. These quickly-dwindling resources not only reduce stormwater flows, they retain important volumes of stormwater, 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 local 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. **Wetlands provide these ecosystem services regardless of the Army Corps' jurisdictional determination**. As such wetlands preservation should be the first step in stormwater management.

Impervious surface coverage reduction should be the second step in reducing stormwater management pressure. Based on the applicant's estimate of 70% impervious surface coverage of the approximately 170.81-acre site, this proposal will create approximately **119.5 acres of new impervious surface**. These hard surfaces, like concrete and asphalt, prevent stormwater from infiltrating into the ground, where they can be absorbed and reduce stormwater volumes. 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. Bryan and Bulloch counties should be specific in their requirements, rather than relying on non-specific, passing references of potential management options. 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.

Finally, the proposed location for this development faces serious and sustained **flooding risks**. Flooding, and its associated damages and pollution risks, will be an ongoing and growing issue on this site. Careful site design and layout should consider and protect the neighboring and nearby properties as well as the natural areas around this site.

Flooding is very likely at this location. FEMA's designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone AE,[1] should draw specific attention. While the "100-year floodplain" name implies that floods will only occur once every 100 years, this obscures the actual risk. Over a 30-year period, the actual flood risk is 26%[2] - a more than 1 in 4 chance for properties in the 100-year floodplain over that time.

The "100-year floodplain" only looks narrowly at the "base flood." The base flood describes the strength of flood that is 1% likely to happen in any year.[3] 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 properties could face. The narrow focus on the 100-year flood not only undercounts the potential frequency of flooding on the properties but also underconsiders the severity of flooding the properties could experience.

Further, reliance on the backwards-looking 100-year flood model further obscures risk. The estimates of floods and the extent of the floodplains rely on historic data, leaving out the most recent and most representative data. With the anticipated increase in storm frequency and intensity in the coming years and decades, the extent, size, and frequency of flooding on these properties is likely greater than the Flood Hazard area anticipates.

The project's current layout presents serious concerns about flood risk and damage. The FEMA Special Flood Hazard Areas that dominate the properties will make it difficult to safely build the proposed development. The Bryan County property is bisected by Zone A floodplains. The abrupt end of these floodplains at the Bulloch County line suggests that these 100-year floodplains likely continue into the Bulloch County property. The Bulloch maps were last updated in 2010, while the Bryan maps were updated in 2014.[4] Both are over a decade old at this point, suggesting their boundaries may be larger, in light of growing storm frequency and intensity. This suggests the proposed development will likely face flooding-related issues throughout its operational lifetime. Bryan and Bulloch counties should strongly consider these risks when deciding whether to rezone these properties and permit the proposed development.

Finally, Bryan and Bulloch counties should also take into account the potential financial burdens related to flooding. Those financial burdens include, but are not necessarily limited to property and structure damage, water and land pollution, and buyout costs. At the most basic level, flooding threatens to inundate, damage, and destroy any structure in its path. Structures within the floodplain see their risks increase. Costs of clean up, collateral damage, and to neighboring properties should be considered. Flooding also presents water pollution threats. As discussed above, gasoline and diesel fuels as well as other remnant vehicle-related pollution from frequent car and truck traffic risks being swept up in flood waters. The nearby Little Ogeechee River is the principal water body threatened by these pollution risks. Finally, if flooding occurs frequently enough, FEMA may offer a property buyout[5] to return the properties

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[1] Federal Emergency Management Agency (FEMA). " Zone A." *See*: https://www.fema.gov/about/glossary/z?%2Fabout%2Fglossary%2Fz= .

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

[3] Federal Emergency Management Agency. "Appendix B: How to Read a Flood Insurance Rate Map (FIRM) Course Glossary". *Available at*: https://emilms.fema.gov/is_0273/groups/157.html

[4] FEMA Flood Maps. https://msc.fema.gov/portal/search?AddressQuery=641%20Highway%2080%2C%20Ellabell%2C%20GA Property searched - 641 Highway 80, Ellabell, GA.

[5] University of Delaware Disaster Research Center and The Nature Conservancy. "Floodplain Buyouts: Challenges, Practices, and Lessons Learned." At page 9. August 2021. *Available at*:

to their now-current conditions. These buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government.[6] This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs would likely fall on the counties. ORK urges Bryan and Bulloch counties to specifically consider and factor in these foreseeable financial costs of building in the floodplain.

Before approving this project, Bryan and Bulloch counties should be able to answer:

- Are the counties comfortable with the increased flood risk this project will create?
- Is there an alternate site plan that could sufficiently reduce or eliminate the added increased flood risk proposed by this project?
- Where are wetlands currently located on the site and how many acres of wetlands will 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?
- Are the proposed stormwater management features sufficient to protect the site for the entire life of the development?
- Can additional stormwater management conditions be added, above current minimums, to help reduce flood risks for future generations of residents?

2. No demonstrable need for additional warehouse space

The Savannah region's warehouse market does not currently need new warehouses, including the 2 million+ square feet of new warehousing space proposed here. The regional market has maintained its current **over 10% vacancy rate**[7] for the last 8 quarters. With a crystal clear lack of need for the proposed use, ORK urges Bryan and Bulloch counties to deny the requested rezoning and deny any requested permit for the proposed development.

The Savannah regional market has no demonstrable need for this proposed warehousing and logistics development. Warehouse development continues at an unprecedented rate, leading to an ever-growing oversupply of

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https://www.nature.org/content/dam/tnc/nature/en/documents/Buyouts_Lessons_Learned_Siders_Gerber_Chavez_TNC_Full_Report_2021.pdf

[6] Federal Emergency Management Agency. "FACT SHEET: Acquisition of Property After a Flood Event." *Available at*: https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event

[7] Colliers (2026 Q3) = **10.47%** (https://www.colliers.com/en/research/savannah/2026q3-industrial)
Lee & Associates (2026 Q3) = **12.9%** (https://www.lee-associates.com/atlanta/2026/10/08/q3-2026-savannah-industrial-market-report/)
Cushman & Wakefield (2026 Q1) = **10.6%** (https://www.cushmanwakefield.com/en/united-states/insights/us-marketbeats/savannah-marketbeats/industrial)

space. Looking specifically at the Savannah-area warehousing market, vacancy rates have continued to rise over the previous year. The vacancy rate remains extremely elevated from the recent low seen in 2022 Q4's vacancy rate of less than 1%. **Between 2022 and 2024**, the Savannah market has **added more than 50 million square feet**[8] of warehouse space - **a nearly 50% increase** in supply over an incredibly short period. In the **4 quarters of 2025 and 3 quarters 2026, another 23 million+ square feet**[9] of new space has been added. Based on the averages of vacant rate applied to total inventory,[10] **there is currently around 18 million square feet of already-existing and vacant warehouse and distribution space.**

In the most recent report published by Colliers,[11] the Savannah region saw **2.4 million square feet of new warehouse space** added to the market. In addition, an estimated 3.2 million square feet was currently under construction, with likely tens of millions more square feet rezoned and approved but not yet under construction, or otherwise under consideration.

In light of this continued oversaturation of warehouse space, ORK along with Savannah Riverkeeper and One Hundred Miles,[12] developed a Warehouse Dashboard.[13] Attachment A, included below, provides a visualization of the warehousing landscape around the proposed site. ORK urges Bryan and Bulloch counties' staff and decision makers to review this tool, available here: https://savrk.maps.arcgis.com/apps/dashboards/438f7c1bd32845628aac697703ac7537# **Simply put, there is no clear need for more new warehouse space.**

In sum:

- There is no clear need for new warehouse space.
- The warehouse vacancy rate remains above 10%.
- Roughly 23 million square feet of warehouse space is entirely empty and ready to be utilized.
- More speculative warehouse space will only add to the glut of supply, at the cost of other land uses.

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[8] Q4 2022 total = 102,993,004 square feet (Q1 2023 total = 103,514,071 [minus] Q1 2023 delivered =521,067) - https://www.colliers.com/en/research/savannah/2023q1industrial
Q4 2024 total = 153,531,831 square feet (Q3 2024 total = 137,731,831 [plus] Q4 2024 delivered = "15.8 million") - https://www.colliers.com/en/research/savannah/2023q1industrial and https://www.colliers.com/en/research/savannah/2024q4industrial
Two-year net increase = 50,538,827 square feet

[9] Per Lee & Associates quarterly reports = **33,547,853 sqft** → 2025 Q4 167,637,487 (minus) 2024 Q4 140,635,189 (plus) 2026 Q1 = 507,460.2026; Q2 =4,756,068 ; 2026 Q3 = 1,300,000.
Per Colliers quarterly reports = **21.6898M sqft** → 2025 Q1 = 4.9M sqft; 2025 Q2 = 4.2M sqft; 2025 Q3 = 943k sqft; 2025 Q4 = 745k sqft; 2026 Q1 = 7.4M sqft; 2026 Q2 = 1,042,093; 2026 Q3 = 2,459,546.
Per Cushman & Wakefield quarterly reports = **16,275,605 sqft** → 2025 Q1 = 4,580,464; 2025 Q2 = 4,009,093; 2025 Q3 = 2,453,583; 2025 Q4 = 2,058,600; 2026 Q1 = 224,640; Q2 = 941,957; 2026 Q3 = 2,007,268.

[10] **Average = 23,837,486 square feet**
Lee & Associates' vacancy rate of 12.8% applied to the total inventory of (2026 Q1 new supply 507,460 sqft + 2025 Q4 total inventory 167,637,487) put the total vacant square footage at **21,522,553.**
Colliers' 9.8% vacancy rate applied to total inventory of 172,492,470 results in **16,904,262** square feet of vacant space.
Cushman & Wakefield put total vacant square footage at **16,644,799.**

[11] Colliers (2026 Q2) = **10.47%** https://www.colliers.com/en/research/savannah/2026q3-industrial

[12] Warehouse Dashboard press release - https://www.ogeecheeriverkeeper.org/release-savannah-area-warehouse-dashboard/

[13] Warehouse Dashboard - https://savrk.maps.arcgis.com/apps/dashboards/438f7c1bd32845628aac697703ac7537#

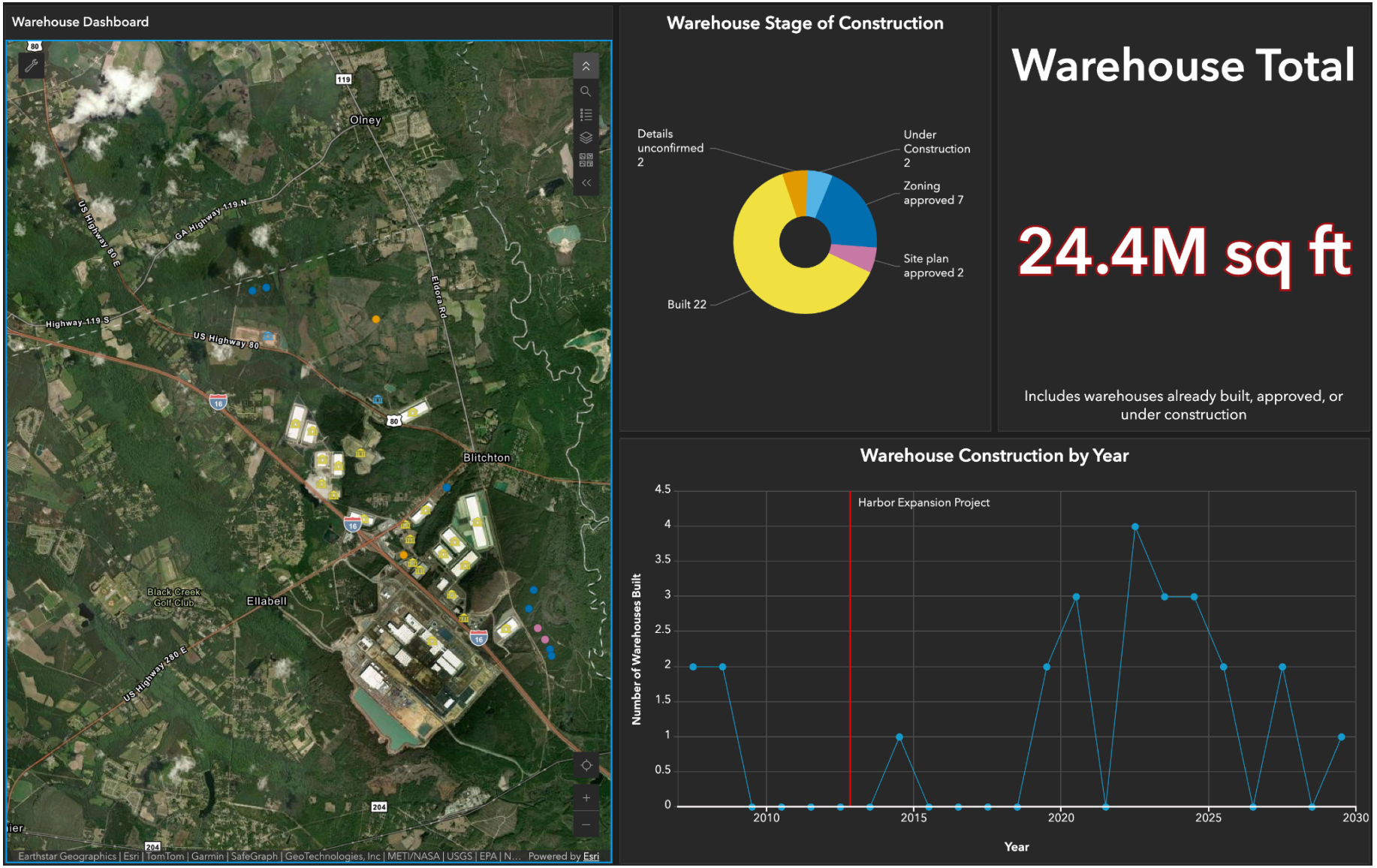
Thank you in advance for your time and consideration; please let me know if you have any questions or would like to talk further on these topics: ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper

Attachment A

Warehouse Dashboard
Developed by:
Ogeechee Riverkeeper, Savannah Riverkeeper, and One Hundred Miles
Select area around the
Warner Tract Industrial development

Available at:
https://savrk.maps.arcgis.com/apps/dashboards/438f7c1bd32845628aac697703ac7537#


Warehouse Dashboard
Olney
Blitchton
Ellabell
Black Creek Golf Club
US Highway 80 E
GA Highway 119 N
Highway 119 S
US Highway 80
Eldora Rd
US Highway 280 E
Earthstar Geographics | Esri | TomTom | Garmin | SafeGraph | GeoTechnologies, Inc | METI/NASA | USGS | EPA | N... Powered by Esri
Warehouse Stage of Construction
Details unconfirmed 2
Under Construction 2
Zoning approved 7
Site plan approved 2
Built 22
Warehouse Total
24.4M sq ft
Includes warehouses already built, approved, or under construction
Warehouse Construction by Year
Harbor Expansion Project
Number of Warehouses Built
Year
0
0.5
1
1.5
2
2.5
3
3.5
4
4.5
2010
2015
2020
2025
2030