

Introduction

1.1 Site Information

Owner/Applicant: Savannah Economic Development Authority

Project Name: Rahn Dairy Ditch Relocation

County: Chatham

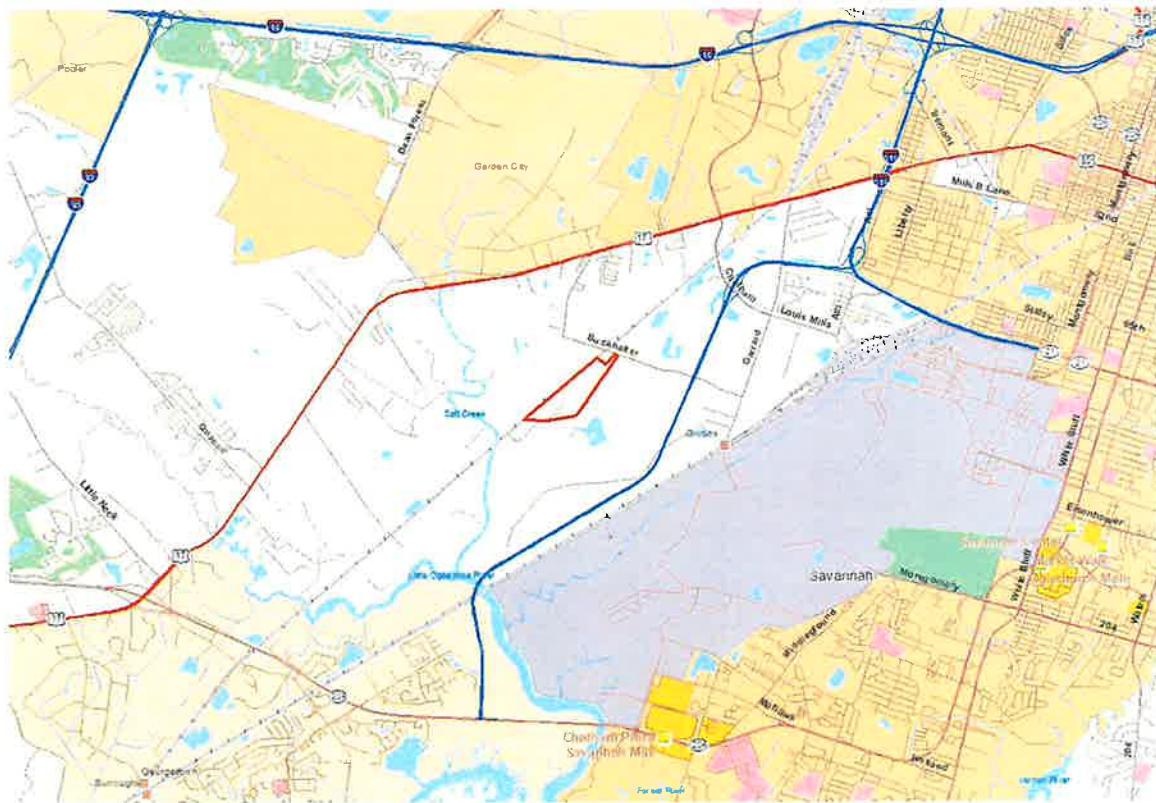
USGS Quadrangle: Garden City SW & SE

TMS: 20943 01003

1.2 Site Location

Rahn Dairy Ditch Relocation is accessed via Veterans Parkway. From I-95 take Exit 94 and travel southeast on Highway 204 for approximately 5 miles and turn right onto Veterans Parkway. Proceed to the entrance to Rockingham Industrial Park. Access throughout the site is currently available on newly formed construction roads.

Figure 1: Project Site Location



1.3 Site Description

The project site is a 106 acre undeveloped tract consisting of +/-22.79 acres of aquatic resource and +/-83.34 acres of upland. An existing 100' wide powerline easement occupies the southern property boundary. For reference, Figure 2 depicts the existing conditions at the site.

Figure 2: Existing Conditions



The high-ground acreage of the site can be described as upland terraces. Most of the delineated wetlands within this parcel are associated with the large canal and its tributaries. The southern portion of the site is occupied by bottomland hardwood wetlands associated with the Ogeechee River. Vegetatively, the high ground at Rhan Dairy can be characterized as either loblolly pine plantation or a mixed pine-hardwood community. The mixed pine-hardwoods consist of such canopy species as loblolly pine, white oak, water oak and sweetgum. The shrub stratum is dominated most notably by wax myrtle and sweetgum saplings.

The natural wetland communities are dominated by canopy species including black gum, red maple, water oak and loblolly pine with an herbaceous layer comprised of cinnamon fern,

Virginia chain-fern and netted chain-fern. The boundaries of the aquatic resources depicted in Figure 2 were reviewed, coordinated and verified by the USACE in an Approved Jurisdictional Determination referenced SAS 2008-00707 on February 25, 2019. A copy of this letter is included as Appendix A.

2.0 Project Need

According to the Container Xchange, The Savannah Port is one of the fastest growing major ports in North America and, as recent as 2022, was ranked 4th among U.S. maritime ports in TEU (twenty-foot equivalent- standard unit of cargo measurement). In addition, in 2021, the vacancy rate for industrial space to serve the supply chain and distribution network associated with the Port was below 5%, which is an indicator of the current demand for new industrial warehouse/distribution buildings.

To support container growth, as well as investments that manufacturers have made in Georgia, the Georgia Ports Authority believes that it must innovate, adapt, and accommodate the needs of its customers with facilities that bring the Port of Savannah closer to their import-export centers. Doing so benefits not only the local and national economy; but also provides jobs and economic development more directly to other areas of Georgia.

Within the past few years, in anticipation of the port's growth and increasing importance in the overall economy of the U.S. and Georgia; the federal and state governments have recognized the lack of storage for shipping containers at the ever-growing port. In an article from 2021 in the New York Times the general manager for the Port of Savannah stated "that they had never had anything close to the number of storage units they were holding and the ships were still moving in". According to the Georgia Port Authority's website and press releases they are reconfiguring and improving the aging facilities to accept even more ships. As these improvements and new facilities come on-line in addition to the projected growth of import TEU by 77% over the next ten years, the need for industrial campuses to complement and support the port's operations and distribution has become substantial. To this end, Georgia county governments and the City of Savannah have incorporated this need into their comprehensive plans in the form of identified employment growth areas, strategic locations of industrial zoning within proximity to major

transportation and neighborhood/community nodes intended to provide work forces in proximity to new industrial developments.

The relocation of the Rahn Dairy canal is necessary for the Rockingham Industrial Park to have access to rail. Without the impact proposed in this application the truck routes, parking and rail access cannot be accomplished. Rail access will not only benefit the park and commerce but will also help alleviate traffic on the highways that would otherwise need to reach the interstate system.

3.0 Project Purpose

3.1 Basic Purpose

The basic purpose of the proposed project is to place fill material in waters of the U.S., including a tidal ditch, to facilitate the layout of Rahn Dairy industrial complex to provide a working storage facility that provides logically reliable truck and rail service.

3.2 Overall Purpose

The overall purpose of the proposed project is to establish a strategic location to serve and supplement the supply chain logistics, operations and supplemental industries created by and associated with the growing functions and operations of The Port of Savannah.

4.0 Project Description

4.1 Aquatic Resource Impacts

To accomplish the stated project purpose, the applicant proposes to impact a total of 1.82 acres of a tidal canal and 0.19 acres of freshwater wetlands as summarized below.

4.2 Development Timeline

The Rahn Dairy Ditch Relocation Project has the full intention of developing the site as soon as possible; therefore, a five-year permit should allow sufficient time for the build-out of the proposed project.

The tidal canal proposed for impact with this application was dug out of uplands in the 1970's in order to relieve regional drainage needs from local irrigation of farmland. Once this area began converting from irrigated agriculture to development Chatham County attempted to install drainage features to prevent the tide from backing up and to help drainage. These efforts were apparently not installed correctly or maintained and the ditch over time converted from freshwater to tidal.

The proposed impact and relocation of the canal as proposed in this application will result in improved infrastructure including roads, utilities and public transportation. Improvements to this singular drainage point for the region are a necessity for the support of existing and future development on this property. The relocation of the tidal ditch would improve regional drainage, reducing the risk of flooding and water damage. This would be of great benefit to the local community and would help to mitigate potential damage caused by severe weather events. The local property owners are having to deal with flooding issues after severe rain events due to the ineffectiveness of the current canal and the backup caused by improper engineering and a lack of a proper tide gate.

5.0 Compensatory Mitigation

The applicant proposes to mitigate for proposed tidal canal impacts in accordance with the USACE Savannah District Compensatory Mitigation Guidelines which allow the district engineer the ability to accept like kind. The newly constructed canal within the existing utility right of way will replace all functions that are lost in the existing canal. The replacement canal that is proposed will be 2.78 acres which exceeds the loss.

The freshwater wetland impacts will be offset through the purchase of mitigation credits from an approved mitigation bank or through the purchase of available in lieu fee credits. Mitigation sheets attached for the 0.19 acres of freshwater wetland will necessitate the purchase of 1.2 mitigation credits (Appendix B.)

6.0 Stormwater

As required by EPD's NPDES program for all developments prior to construction, there will be an adequate EPD approved stormwater management plan incorporating BMPs and that is capable

of meeting the needs of the proposed project. As these plans are not generally designed prior to obtaining a 404 Individual Permit and 401 Certification, the exact locations of such structures and support structures are not known at this point in time. The project engineer has been made aware of and intends to employ accepted stormwater management techniques, where practical, as part of the final stormwater plan to prevent runoff from having adverse impacts to adjacent aquatic features. The location of the implementation of such techniques and structures will be included in the comprehensive stormwater management plan submitted to EPD or local MS4 for approval under the NPDES program.

7.0 Archaeological and Cultural Resources

A complete cultural review was completed for the Rockingham Industrial and Business Park and an MOA was entered into by the Georgia Department of Georgia Community Affairs office on January 5, 2021. None of the potentially eligible sites will be affected by the proposed development withing this submittal. A copy of the MOA and a map of potentially eligible sites is included in Appendix C and is subject to the use restrictions set forth by the Georgia Department of Community Affairs office.

8.0 Threatened and Endangered Species

A biological assessment for federally protected species was completed by S & ME in March of 2021 for the entire Rockingham Industrial and Business Park for which this project is a part. This assessment includes a stamp from USFWS that states *Based on available information, federally listed species are not likely to occur on the project site.*

A complete copy of this assessment is included as Appendix D.



November 18, 2025

Georgia Department of Natural Resources
Ms. Deb Barreiro
Via Email

**RE: SAS 20224-00227
Rhan Dairy Ditch Relocation Project
Chatham County, Georgia**

Dear Ms. Barreiro:

Please use this letter and attached exhibits as a response to your email dated October 28, 2025, requesting additional information for the referenced permit submittal. In response to the letter:

1. **A properly executed Revocable License identifying the waterway associated with the proposed project.**

Signed Revocable License attached.

2. **Please provide additional discussion on how the proposed project fulfills the stated basic project purpose of providing logically reliable rail and truck service.**

To the question regarding the Purpose and Need section of the permit application you can see in the Master Plan, Permit Exhibits and also in the narrative that railroad access is absolutely expected and critical to the new facility proposed in this application. Not only do the exhibits show that rail access is expected with this new expansion but the support letter from Rockingham also elaborates to the anticipation of other facilities within the larger industrial park being able to now utilize rail access with this facility. As for practical alternatives that may exist there is no other location within the existing park that can provide rail access with less wetland impacts, especially considering the proposed impacts are to a manmade canal and not unaltered freshwater or tidal wetlands.

Please be clear that the overall purpose and need of this project is “to provide a new warehouse facility that has both road and railway access while also providing rail access to the entirety of the Rockingham Business and Industrial Park.”

3. **Please provide additional discussion on how the proposed drainage project fulfills the stated purpose of providing improved infrastructure including roads, utilities and public transportation.**

The proposed expansion allows for infrastructure improvements to Rockingham Park by allowing for access to rail, which does not exist today. By being able to utilize the existing rail line the park will be able to decrease the necessary truck traffic for hauling goods and as a result decrease the necessary truck traffic on the highways, improving traffic on public thoroughfares. The proposed

development within this permit will help to improve congestion of area highways and reduce need for costly highway repairs.

4. **Please provide additional discussion on how the stated purpose of the proposed drainage project would improve regional drainage, reduce the risk of flooding and water damage to the local community, and would help to mitigate potential damage caused by severe weather events.**

The existing canal that is intended to be relocated was not completed to specs originally when a control structure was not placed on the outer end preventing tidal waters from moving inland. A control structure should have only allowed water to exit the ditch to control stormwater which would have allowed for true drainage of the region as was intended. The proposed replacement canal unlike the existing canal will be graded properly to allow stormwater to fall naturally while not increasing turbidity during heavy rain events. The new replacement ditch proposed with this permit application will utilize survey data to prevent river backflow by digging to true grades. The existing ditch appears to have been installed without such measures which allow for too much backflow and slower drainage during heavy rain events.

The existing Rahn Dairy Canal drains approximately 550 acres in Chatham County. The canal currently has a 36" RCP culvert that serves as a flow restriction under an existing road crossing. After the canal is relocated, the road crossing will be re-installed but the 36" RCP flow restriction will be replaced with (2) 60" CMP culverts. This upgrade results in larger flow capacity and the reduction in the water surface elevations in the upstream reach by 0.20' (on average).

5. **Please provide additional discussion on how the proposed project design addresses the State's Public Interest consideration specifically related to increased erosion, shoaling of the channels, or stagnant areas of water that may be created as a result of this project and whether or not unreasonably harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal;**

This canal is not navigable. The new channel will be cleanly graded to minimize stagnation. The tidal effect will ensure the constant flow of water.

6. **A statement certifying that the project is not over a hazardous waste site or landfill.**

There is no mapping to indicate that any prior activity on the site would indicate a disposal area for a landfill or hazardous waste site. In addition, the overall developer of the Rockingham Industrial Site has no knowledge of such activities every taking place on the property.

7. **Exhibits of impacts to CMPA jurisdiction specific to Tract 2 of the development.**

The attached exhibit clearly states "saltwater" for the canal and the intended saltwater impacts of relocating the canal are summarized with acreages provided.

8. **Any, and all, recorded Easements, Right of Ways agreements, and associated exhibits burdening Tract 2.**

Please find attached easement license agreement with Georgia Power along with the encroachment agreement with Georgia Power.

9. **Written authorization from an authorized agent of the Easement or ROW holders allowing ingress, egress and/or construction of permanent structures in the recorded easement.**

Encroachment agreement with Georgia Power attached.

10. **A site plan delineating and quantifying the upland component of the project.**

All intended amenities and development are included in the plan view provided with the application and with this letter. There are no activities in uplands that are known or expected as part of this development that are not included in the permit exhibits.

11. **An exhibit illustrating the 50ft. CMPA marshlands buffer for the parcel as measured horizontally inland from the coastal marshlands-upland interface (verified JD line). This includes existing and proposed impervious surfaces or pre-existing structures within the delineated buffer (ie: paved roads, parking lots, drainage infrastructure, utilities, and outfalls) as well as all activities that will occur within the 50ft. CMPA marshlands buffer. This includes, but is not limited to clearing, grading, filling, construction, and paving associated with the proposed project in or through the 50ft. CMPA marshlands buffer;**

The existing 50' CMPA Marsh Buffer has been added to the overall exhibit and highlighted in green. The 50' buffer will be built to the buffer standards in the Bf attached. Buffers cannot be accomplished where the canal and existing ROW of Georgia Power coexist because this areas must be routinely mowed for ROW maintenance.

12. **Documentation of the existing condition of delineated buffer.**

Please find attached current pictures of the existing conditions of onsite buffers along the canal. Please note that there is maintenance shelf along the canal that allows the City of Savannah to routinely excavate and maintain the canal for drainage.

13. **Details for all temporary impacts in CMPA jurisdiction from construction of the project. All impacts must be quantified.**

All anticipated impacts both permanent and temporary are included in the impact acreage in the attached conceptual exhibit for the proposed facility.

14. **Description of buffer design, installation, and maintenance plans. Applicant should refer to the current edition of the Georgia Stormwater Management Manual for technical specifications and standards specific to buffers.**

Buffers will be built per the Bf summary provided with this plan. The new canal will have clean 3:1 side slopes and all disturbed areas will be stabilized in accordance with an approved Erosion, Sedimentation, and Pollution Control Plan, pursuant to the NPDES permit and approved by the Local Issuing Authority (LIA – Savannah). The canal side slopes and immediate surrounding area will be maintained by an established Property Owners Association (POA) in accordance with the established maintenance plan to include Bi-annual inspections, and debris/vegetation removal

15. **Description and identification on site plan of any temporary structures proposed within the delineated buffer that are necessary for the construction of the marshland's component of the project.**

Temporary structures are not proposed.

16. **Description and identification on site plan of any vegetated plantings or grading of vegetation within the delineated buffer. Applicant is referred to the Georgia Stormwater Management Manual. Note: Planting and grading within the buffer must be designed and installed to enhance stormwater treatment.**

The new 50' buffer will be planted according to the Bf buffer plan with trees planted 6-10 feet apart within the first 20 feet, with managed forest for the next 10 feet and the following 20 feet will utilize grasses. The new vegetative buffer will be allowed to stabilize and then naturally grow. Note that the topography of this area is relatively flat with little high velocity runoff.

17. **Description of your Stormwater Plan for the upland component of the project. Note: No discharge of untreated stormwater is allowed from developed or disturbed areas, whether surface or piped, to coastal marshlands from the upland component of the project (unless waiver is granted by Committee).**

Stormwater will be conveyed to wet detention ponds for treatment via curbs, gutters, flumes, and storm pipes before being released in a controlled manner to defined outfall locations. The GA Stormwater Management Manual (Blue Book) has discrete requirements for water quality and flood control including Runoff Reduction, Aquatic Resource Protection, Channel Protection, Overbank Protection, and Extreme Flood Protection. The site development plans for this development will be reviewed and approved by the Local Issuing Authority and MS4 operator. Both of these entities have adopted the model stormwater ordinance, and the plans must meet the minimum standards set forth above.

18. **A letter from the local governing authority of the political subdivision in which the property is located stating that the applicant's proposal to fill wetlands, clear vegetation, grade upland, construct a drainage canal in the upland at this location is not violative of any zoning law (123-5-286(b)(6)). The submitted letters of support are suitable for submission, but are not considered to meet the statutory requirement that the project does not violate zoning laws.**

Please find attached the zoning letter from the City of Savannah regarding zoning information for the site.

19. **A discussion of the activities that certify that the project will be conducted in compliance with applicable erosion and sediment control responsibilities.**

The Erosion, Sedimentation, and Pollution Control plans will be designed by a certified Level II Plan Preparer (GA Professional Engineer) and reviewed and approved by GSWCC and the Local Issuing Authority. A Notice of Intent will be filed with EPD and the Primary Permittee will be responsible for the execution of the approved development plans.

Please do not hesitate to contact me with any questions or comments you may have concerning this application.

Sincerely,

A handwritten signature in black ink that reads "J. Asher Howell". The signature is fluid and cursive, with "J. Asher" on the first line and "Howell" on the second line.

J. Asher Howell, Principal
Beaufort Office

Enclosures

cc.

Mr. Neil McKenzie, Project Engineer



January 7, 2026

Cole Chenowith
Landmark 24
2702 Whatley Avenue, Suite B-1
Savannah, GA 31404
cchenowith@landmark24.com

RE: 120 Landmark Boulevard W (the Property)
PIN: 20943 01003

To Whom It May Concern:

Per your request, I hereby certify that I am a Planning Manager in the Planning and Urban Design Department for the City of Savannah, Georgia (the Jurisdiction); and I am responsible for the administration and interpretation of the Zoning Ordinance of the Jurisdiction. Furthermore, I have access to the information required to make the following certifications:

- 1. Current Zoning Classification:** As of January 7, 2026, the Property is zoned M-CO (Manufacturing - County). This zoning indicates property that has been annexed by the City of Savannah but which retains Chatham County zoning regulations for development. The Chatham County zoning district standards are adopted into the City of Savannah ordinance by reference using the "-CO" suffix on the zoning district title. The adjacent zoning on all sides is M-CO.
- 2. Permissible Uses:** Per Sec. 4-1 of the Chatham County zoning ordinance, "*The purpose of this district shall be to create and protect areas in which nonnuisance producing manufacturing activities and nonmanufacturing uses closely related to such activities will be permitted.*"

The uses allowed in the M-CO zoning district are identified in Sec. 4-5.2 B and I Use Table of the Chatham County zoning ordinance. "Wholesaling and warehousing" is a permitted use in M-CO zoning districts.

- 3. Development Standards:** The general development standards that govern the parcel can be found in Sec. 3, 5, 6, and 7 of the Chatham County zoning ordinance. Wetlands are regulated by Sec. 9-4 of the Chatham County zoning ordinance which states in part (a):

"The provisions in Subsection (b) of this section shall not apply if the applicant can provide to the Zoning Administrator a valid U.S. Army Corps of Engineers wetland delineation that verifies that the proposed activity is not located within jurisdictional wetlands, or if the applicant can provide a valid U.S. Army Corps of Engineers permit or letter that authorizes the proposed activity within jurisdictional wetlands. If such evidence of compliance with U.S. Army Corps of Engineers permitting requirements is provided, the Zoning Administrator shall follow normal procedures for issuing a building permit or a demolition permit."

Relocation of the existing drainage canal, as shown in the plans provided by the applicant entitled "Wetland Impact Exhibits for Rahn Dairy Canal Relocation – Rockingham Farms" and dated 07/10/2025, does not violate the Chatham County zoning ordinance if it is permitted by the U.S. Army Corps of Engineers.

4. **Overlay Districts:** The Property lies within the boundaries of the [Airport, Airfield Overlay District](#).
5. **Variances, Zoning Map Amendments, Special Use Permits, etc.:** The Property was created by a subdivision with File no. 20-001961-SUBP. The Property was annexed and rezoned to M-CO as part of a larger tract in July 2022 under File no. 22-002773-ZA.
6. **Zoning Violations:** I am not personally aware of any action or proceeding by the Jurisdiction pending before any court or administrative agency with respect to the zoning of the Property or any improvements located thereon.
7. **Code Violations:** I am not personally aware of any existing violations related to the zoning ordinance on the Property.

This confirmation is made as of the date of this letter and does not constitute any representation or assurance that the Property will remain in the current zoning district for any specified period or that the list of uses permitted in the zoning district will remain in effect for any specific period.

The undersigned certifies that the above information contained herein is believed to be accurate and is based upon or relates to the information supplied by the requester. The Jurisdiction assumes no liability for errors and omissions. All information was obtained from public records, which may be inspected during regular business hours.

Sincerely,



John Anagnost
Planning Manager



CHATHAM COUNTY DEPARTMENT OF ENGINEERING

124 Bull Street, Room 430

P.O. Box 8161

Savannah, Georgia 31412-8161

FAX 912-652-7818

912-652-7800

Suzanne V. Cooler, P.E.
County Engineer

Nathaniel Panther, P.E.
Assistant County Engineer

September 15, 2025

Savannah Economic Development Authority
906 Drayton Street
Savannah, Georgia 31401

RE: Rahn Dairy Canal Relocation

The Rahn Dairy Canal is a storm water conveyance located in the central portion of Chatham County, carrying runoff from the Buckhalter Road area. The existing route of the canal contains many breaks and curves, and crosses several privately held properties, most of which have driveway crossings on pipes. The lower half of the canal is located on lands that are part of the Rockingham Farms development.

As part of that development, it is proposed to relocate the canal to a more linear location along the existing Georgia Power easement. This will open up certain parcels for development and improve overall drainage in the basin.

Chatham County fully supports this relocation of the Rahn Dairy Canal and will be available to assist in design or review of the project as needed.

Please contact me at 912-652-7811 with any questions or concerns.

Kevin D. Hayes

Kevin Hayes, PE
Chatham County Drainage Engineer



Chief
Infrastructure &
Development
Officer

August 11, 2023

Savannah Economic Development Authority
906 Drayton Street
Savannah, Georgia 31401

RE: Rahn Dairy Canal Relocation

The Rahn Dairy Canal is a storm water conveyance located in the central portion of Chatham County, carrying runoff from the Buckhalter Road area. The existing route of the canal contains many breaks and curves, and crosses several privately held properties, most of which have culverted driveway crossings. The lower half of the canal is located on lands that are part of the Rockingham Farms development.

As part of that development, we propose to relocate the canal to a more linear location along the existing Georgia Power easement. The City of Savannah supports this relocation of the Rahn Dairy Canal as will improve overall drainage within the basin.

Sincerely,

Heath Lloyd
Heath Lloyd
City of Savannah
Assistant City Manager/Chief Infrastructure and Development Officer



CHATHAM COUNTY DEPARTMENT OF ENGINEERING

124 Bull Street, Room 430
P.O. Box 8161
Savannah, Georgia 31412-8161
FAX 912-652-7818
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Suzanne V. Cooler, P.E.
County Engineer

Nathaniel Panther, P.E.
Assistant County Engineer

April 11, 2023

Savannah Economic Development Authority
906 Drayton Street
Savannah, Georgia 31401

RE: Rahn Dairy Canal Relocation

The Rahn Dairy Canal is a storm water conveyance located in the central portion of Chatham County, carrying runoff from the Buckhalter Road area. The existing route of the canal contains many breaks and curves, and crosses several privately held properties, most of which have driveway crossings on pipes. The lower half of the canal is located on lands that are part of the Rockingham Farms development.

As part of that development, it is proposed to relocate the canal to a more linear location along the existing Georgia Power easement. This will open up certain parcels for development and improve overall drainage in the basin.

Chatham County fully supports this relocation of the Rahn Dairy Canal and will be available to assist in design or review of the project as needed.

Please contact me at 912-652-7807 with any questions or concerns.

The handwritten signature of Bill Nicholson, which appears to read "Bill Nicholson".
Bill Nicholson
Chatham County Drainage Engineer