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

April 13, 2023

Via E-Mail

Environmental Protection Division
2 Martin Luther King Jr. Drive SW
1152 East Tower,
Atlanta, Georgia 30334
EPDcomments@dnr.ga.gov

Re: Comments on Public Notice No. 2023-05ML - Avalon Trace Subdivision Onsite System

To whom it may concern:

Ogeechee Riverkeeper's (ORK) mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and use that information to amplify the voices of those who speak for the watershed. One of ORK's primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality.

ORK offers these comments on Southern Legacy Holdings, LLC's application for coverage under General Permit GAG278000 for a subsurface land application system for the Avalon Trace subdivision in Statesboro, GA. We urge the Georgia Environmental Protection Division (GA EPD) to deny this permit request and, instead, direct Southern Legacy Holdings to pursue interconnection into the City of Statesboro's Consolidated Sewer System. Alternatively, we ask GA EPD to condition any permitted activity as suggested below.

Ogeechee Riverkeeper urges against permitting a community septic system for the Avalon Trace subdivision. With already-existing sewer infrastructure close to the property, plans for expanded sewer infrastructure and wastewater capacity, and the imminent need for additional wastewater treatment needs from future housing and other development, land application, and septic systems are not a practical or sustainable solution to wastewater treatment needs. Instead, addressing wastewater management needs through interconnection into existing sewer systems and treatment facilities will better ensure that environmental, public health, and development goals can be achieved while minimizing negative impacts.

The subdivision is already very close to existing wastewater infrastructure. According to City of Statesboro maps,¹ a force main runs along the railroad tracks that parallel US Highway 301. This appears to be less than a mile away from Avalon Trace's proposed location on Coley Boyd Road. This distance from Statesboro's sewer infrastructure will be further reduced when the city's sewer system expansion plans are completed. Upon completion, a sanitary sewer line will run along US Highway 310, with a spur reaching to Coley Boyd Road between Sandalwood Circle and Furman Road. Between the existing force main and the planned sanitary sewer line, Avalon Trace is extremely close to the Consolidated Sewer System. The developers should take advantage of that proximity.

In addition, Bulloch County is currently contemplating its needs for expanding wastewater treatment. The county is negotiating purchasing treatment capacity at the forthcoming North Bryan Water Reclamation Facility.² With incoming development related to the Hyundai manufacturing facility, the county is clearly planning to address wastewater needs by avoiding expanded land application and septic systems. The GA EPD should preemptively consider the same here, rather than reactively responding to septic system issues in the future.

Wastewater management through a closed sewer system and treatment facility is much preferred to land application when that option is available. As is being seen in Chatham County, poorly-maintained, aging, and failing septic systems are contributing to public health and environmental issues, leading to polluted waterways and recreation areas. Often, the sources of these issues are dispersed and difficult to identify. This can largely be avoided by connecting into consolidated sewer and wastewater treatment systems. With that in mind, the long-term health of Dry Branch and Lotts Creek should be considered in this permitting process. These tributaries to the Canoochee River are the closest waterbodies to Avalon Trace and play important ecological and recreational roles in the area. Interconnection into Statesboro's Consolidated Sewer System provides the best protection from wastewater pollution for these waters and their users. .

ORK urges the GA EPD to deny this permit request. With existing infrastructure so close to the proposed subdivision, its wastewater management would be best handled with interconnection into that system. ORK strongly urges against land application systems to treat wastewater, especially with the forecasted development for the area.

If GA EPD ultimately decides to permit Avalon Trace under the General Permit, ORK makes two additional requests. First, ORK urges GA EPD to condition approval on building the land application system to be easily convertible into a closed sewer system that can be connected to the City of Statesboro's Consolidated Sewer System. And second, ORK asks for a permit condition that requires Southern Legacy Holdings to interconnect Avalon Trace's wastewater system into the City of Stateboro's Consolidated Sewer System when the sanitary sewer spur is installed at Coley Boyd Road.

¹ See Attachment A - City of Statesboro Consolidated Sewer System. *Also available at* <https://www.statesboroga.gov/wp-content/uploads/2012/01/Statesboro-Water-and-Sewer-Exhibitis-36x48.pdf>.

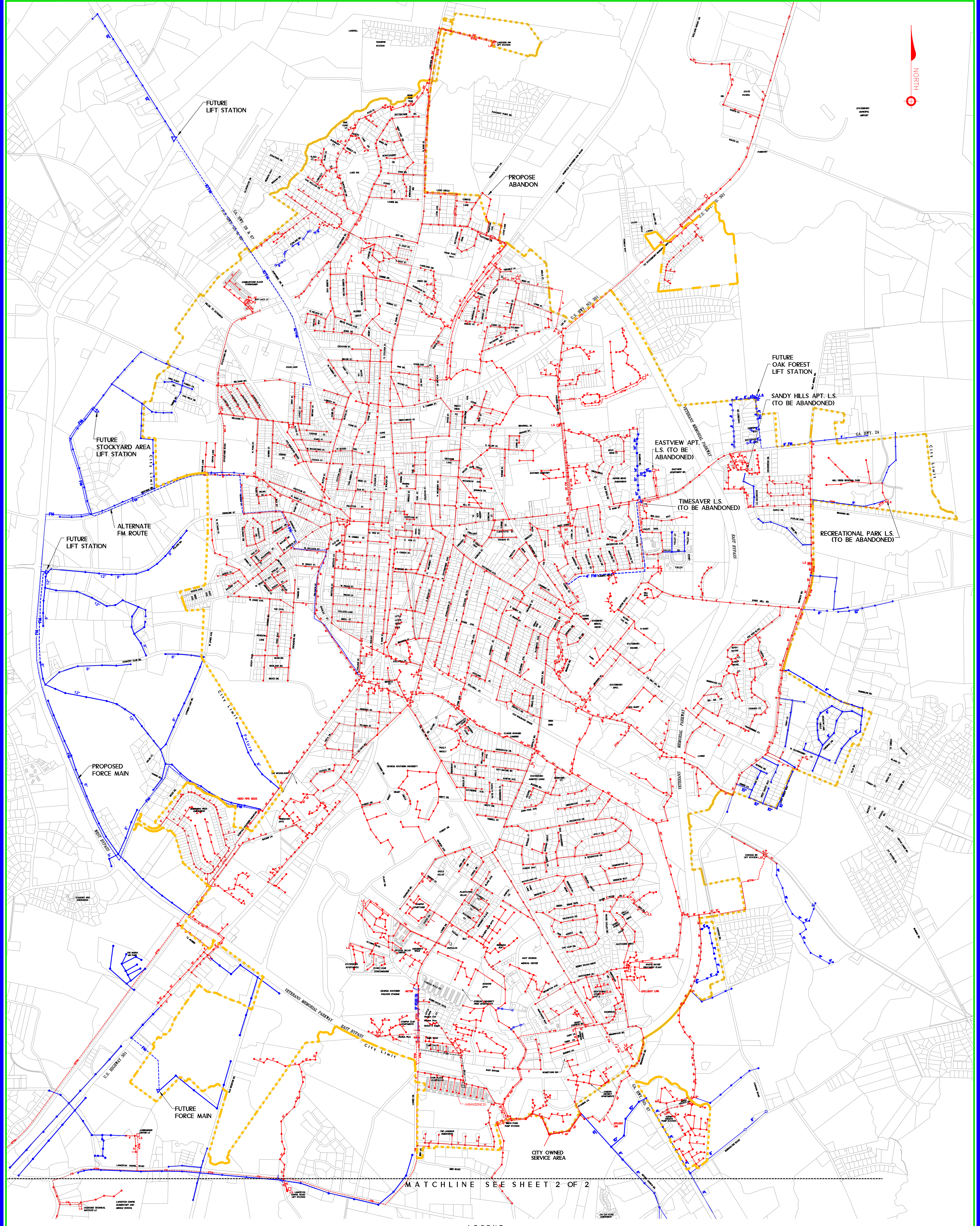
² Thomas & Hutton. "Environmental Review and Planning Document for North Bryan Water Reclamation Facility." Revised March 2023. At pages 11 and 12.

Thank you in advance for your time and consideration; please let me know if you have any questions:
ben@ogeecheeriverkeeper.org or 866-942-6222 x9.

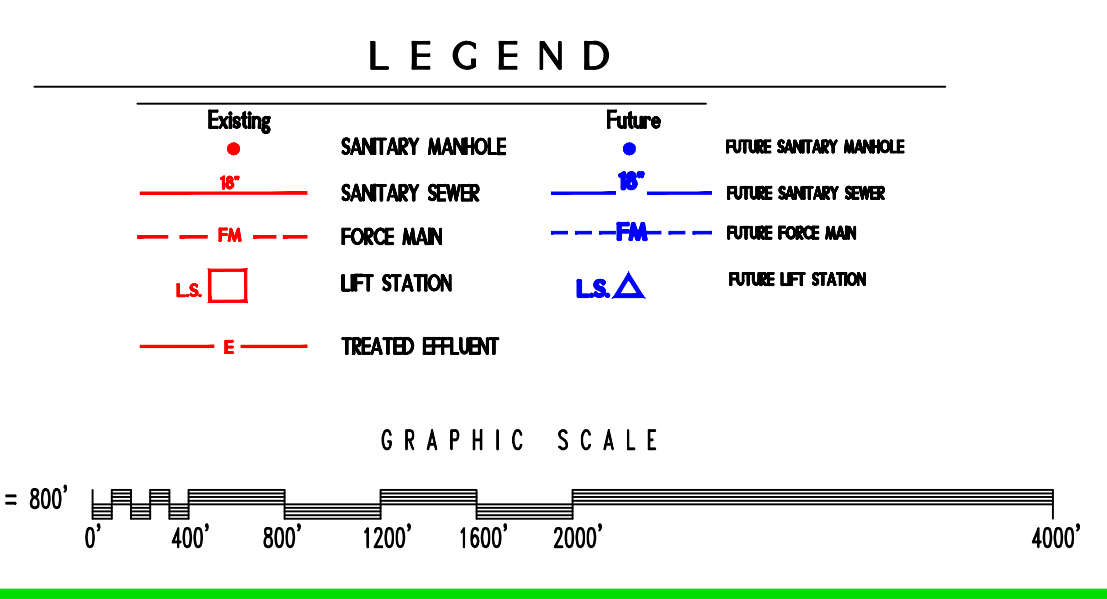
Ben Kirsch, Legal Director
Ogeechee Riverkeeper

Attachment A

City of Statesboro Consolidated Sewer System Master Plan



HUSSEY GAY BELL
Established 1958



CITY OF STATESBORO
CONSOLIDATED SEWER SYSTEM
MASTER PLAN

SCALE: 1" = 800'

DATE: APRIL 2018

