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[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

November 30, 2023

**Via E-Mail**

Environmental Protection Division  
2 Martin Luther King Jr. Drive SW  
1152 East Tower,  
Atlanta, Georgia 30334  
[EPDcomments@dnr.ga.gov](mailto:EPDcomments@dnr.ga.gov)

**Re: Comments on Barrister Crossing PH II- Julian Court Permit Application GAG278111 for coverage under General LAS Permit for Large Community Systems (GAG278000)**

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 and proposed projects throughout the watershed that could pose a significant threat to its water quality and aquatic environments.

Ogeechee Riverkeeper provides these comments on the Barrister Crossing development's proposed land application system (LAS). ORK urges caution from both State and County planners and decision makers in pursuing wastewater treatment to address expanding capacity needs through piecemeal onsite treatment systems and to, rather, consider a regional system approach to better protect human and environmental health. Additionally, if this LAS is to be permitted, ORK asks that regular maintenance and pumping requirements as well as an alternative drainfield site reservation be placed into any issued permit for the Barrister Crossing development.

First, in light of recent and future growth and development coming to Effingham County, Ogeechee Riverkeeper urges a more regional, concerted, and comprehensive approach to address expanding wastewater treatment needs in Effingham County. Significant development has been underway in recent years and the county's population growth was seventh-fastest in Georgia.<sup>1</sup> The State of Georgia expects Effingham County to grow by more

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<sup>1</sup> University of Georgia - Carl Vinson Institute of Government. "Population Change in Coastal Georgia". At page 22. Available at: <https://waterplanning.georgia.gov/document/document/projections-and-demographics-coastal-georgia/download>

than 12,000 by the end of the decade- from 66,741 in 2021 to 78,874 in 2030 - and top 100,000 by 2043.<sup>2</sup> This influx of population will place additional strain on the current wastewater treatment infrastructure. As development continues and available land becomes more scarce, it will be more difficult to site and rely on on-site treatment systems. 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 and elsewhere, 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 pollution issues are dispersed and difficult to locate and identify.

These issues can largely be avoided by connecting into consolidated sewer and wastewater treatment systems. Expanding Effingham County's sewer infrastructure and service area will better serve county residents while protecting human and environmental health. Likewise, the construction and operation of the nearby North Bryan Water Reclamation Facility has the potential to provide high quality wastewater treatment capacity that Effingham County could rely on. Regardless of specific strategies, a consolidated sewer system, rather than a scattering of on-site systems, is easier to monitor, maintain, and account for, especially ahead of continued growth. ORK urges planners, regulators, and decision makers to take a long-term view of wastewater management in light of this expected growth in this and all future wastewater decisions.

Second, if the Georgia Environmental Protection Division (GA EPD) ultimately decides to permit this LAS, Ogeechee Riverkeeper asks that two additional requirements be included in the final permit. The first requested requirement is to enshrine a regular pumping and disposal schedule of the septic tank sludge and to include a maintenance, monitoring, and records-keeping component. In Section III.5, the applicant states it will provide this service on a "periodic" basis of 3-5 years. ORK asks that GA EPD decide on a specific pumping schedule and include that in the permit terms. Further, at the time of pumping and disposal, ORK asks that GA EPD require a maintenance check and any necessary repairs be made. Finally, following the pumping, disposal, and maintenance, ORK asks that the operator then be required to submit records of the pumping, disposal, maintenance, and repairs to the GA EPD. This will ensure that any potential negative impact is minimized as efficiently as possible.

The second requested requirement is for the applicant to plan for and reserve an alternate drainfield for the proposed LAS. In the event that the primary drainfield is damaged or otherwise made inoperable, it is crucial that an alternative site exists to handle wastewater treatment. Without planning and reserving an alternative site, it is possible that there may be no alternative at the time of a future system, drainfield, or other failure. ORK asks that GA EPD require the applicants plan for and reserve space for an alternative drainfield to avoid potential future human and environmental harms.

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

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<sup>2</sup> Georgia Governor's Office of Planning and Budget. "Population Projections Visualization." Available at: <https://opb.georgia.gov/census-data/population-projections>.