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

December 19, 2023

**Via E-Mail**

Simon Hardt, Senior Regional Planner  
Coastal Regional Commission of Georgia  
[shardt@crc.ga.gov](mailto:shardt@crc.ga.gov)

**Re: Comments on DRI # 4041 - Keller PD - Savannah**

Dear Mr. Hardts:

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

ORK's comments on the Keller Planned Development (PD) concern two topics. First, water supply to and wastewater management from this proposed PD raises concerns that should be considered and addressed as early as possible. Second, all construction and development on the property should occur outside of the floodplain. ORK urges careful consideration of these topics prior to any rezoning, permitting, or construction decisions.

1. Water Supply and Wastewater Treatment Concerns

Both the water supply and wastewater treatment needs of any development in coastal Georgia must carefully consider its long-term impacts, implications, viability. Since at least 2006, Upper Floridan Aquifer (UFA) has received special protections from withdrawals and wastewater discharge due to decades of overutilization. With Bryan County and the City of Pembroke falling in one of the UFA management zones, permittees and decision makers should make a fully informed decision of the near- and long-term impacts and viability of this housing development in light of the additional strains it will place on groundwater resources. Likewise, wastewater treatment should take a long-term view and embrace a regional approach to respond to the areas anticipated and projected growth.

Any new water withdrawal and wastewater treatment demand should be carefully considered. Under the Georgia Department of Natural Resources' Coastal Georgia Water & Wastewater Permitting Plan for Managing Salt Water Intrusion (2006 Plan), the City of Savannah and Chatham County fall in the "Red Zone" management area.<sup>1</sup> The 2006 Plan establishes water withdrawal management requirements for this zone that include conservation and reuse considerations as well as a justification of need, among others. Importantly, the 2006 Plan also limits all total permitted withdrawals in the Red Zone to the amount withdrawn in 2004, with further reductions required by 2025. These limitations caused the City of Savannah to comment in a recent DRI for another PUD that "...the city does not have (and will not have for several years) the water and sewer capacity...nor...the required water distribution and sewer conveyance infrastructure" to serve the development.<sup>2</sup>

Continued overutilization of the UFA threatens to increase the rate of saltwater intrusion into the UFA, threatening the region's main drinking water supply. In light of the region's anticipated growth, demand and strain on the UFA will only increase if piecemeal permitting is used rather than a methodically considered approach. Wastewater treatment capacity is also equally concerning and should be addressed in a comprehensive and regional manner that avoids on-site or septic treatment. ORK urges local, regional, and state decision makers to take a regional, long-term, and holistic view of both the water supply and wastewater treatment demand issue and develop comprehensive and sustainable solutions that will allow future generations to thrive throughout Georgia's northern coastal region. Likewise, ORK urges the decision makers here to confirm that these needs are sufficiently addressed at the Keller PD site prior to any rezoning or permitting decisions.

## 2. Floodplain Fill and Construction Concerns

The Keller PD should avoid developing or constructing any buildings within the nearby floodplain. The portion of the proposed development areas lying within the 100-year floodplain should be removed in order to ensure the resiliency of those buildings and the development as a whole. ORK asks that the developers and the county decision makers make the minor adjustments needed to avoid allowing construction activities within the floodplain.

ORK urges caution in the proposed building within the floodplain. In Georgia, 'floodplain' is a commonly used shorthand for the "Special Flood Hazard Area," which is described as an "area of high flood risk that is inundated by the 1% annual flood chance."<sup>3</sup> This is the same definition that the Federal Emergency Management Agency (FEMA) uses for its Flood Hazard Zone A designation.<sup>4</sup> FEMA states that these areas have at least a one-in-four chance of flooding over a 30-year period.<sup>5</sup> And as storm frequency and intensity is expected to increase in the coming decades, the possibility of flooding likewise increases. As such, any construction in these areas is exposed to a significant amount of flood risk over the life of the building.

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<sup>1</sup> Georgia Department of Natural Resources. "Coastal Georgia Water & Wastewater Permitting Plan for Managing Salt Water Intrusion" (2006 Plan). June 2006. *Available at:*

[https://www1.gadnr.org/cws/Documents/saltwater\\_management\\_plan\\_june2006.pdf](https://www1.gadnr.org/cws/Documents/saltwater_management_plan_june2006.pdf)

<sup>2</sup> Coastal Regional Commission. "Development of Regional Impact Report - Prepared for Savannah DRI #4091 New Hampstead PUD Amendment November 14, 2023." *See* City of Savannah comment, at page 36. *Available at:*

<https://files.constantcontact.com/4e8f857f201/16567632-0676-48fb-8b5a-c40810eb9d15.pdf>

<sup>3</sup> *See* GA EPD's 'Floodplain Management' webpage, *available at:*

<https://epd.georgia.gov/watershed-protection-branch/floodplain-management>.

<sup>4</sup> *See* <https://www.fema.gov/glossary/zona>.

<sup>5</sup> FEMA. "Flood Maps." *See:* <https://www.fema.gov/flood-maps>.

As currently proposed, 6.2 acres of open space is proposed to be filled to allow for development. Most of this open space is floodplain. 4.89 acres of this total will be filled in Retail Parcels 3, 18, and the combined 4, 5, 6A, and 6B parcels. However, Multi-Family Parcel 10 will fill an additional 1.15 acres and Multi-Family Parcel 11 fills 0.16 acres. ORK asks that these parcels be reconsidered and revised as to avoid construction within the floodplain.

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