



PO Box 16206
Savannah, GA 31416
Phone/Fax: 866-942-6222

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

February 21, 2025

Via E-Mail

Caity McKee, Senior Planner
Coastal Regional Commission
cmckee@crc.ga.gov

Re: Comments on DRI #4381 - Gas Pro Travel Center #108 - Bulloch County

Dear Ms. McKee:

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 in the watershed that could pose a threat to its water quality and aquatic environments.

ORK's comments on the Gas Pro Travel Center #108 development and its conditional use permit fall into three overarching categories. First, all wastewater capacity should wholly avoid on-site management system and should only be addressed by the City of Statesboro. Second, all wetlands on the site should be preserved and sufficiently protected. Third and finally, stormwater management should be carefully considered to avoid automotive runoff and reduce potential contributions to local flooding. ORK urges Bulloch County to ensure these concerns are fully addressed prior to approving this request conditional use permit.

1. Require wastewater service through Statesboro; avoid on-site management systems

The Gas Pro Travel Center development's conditional use permit should be conditioned on interconnection into the City of Statesboro's wastewater system. While the Development of Regional Impact announcement and the developer-applicant state that the City of Statesboro will provide wastewater treatment capacity, that statement is couched in exceptions that would allow for on-site sewage management. ORK strongly urges Bulloch County to not allow for on-site wastewater management for this project.

On-site wastewater management presents longer issues with both maintenance and pollution. Septic systems, land application systems, "package" treatment plants, and any other system all present expensive and long-term

maintenance concerns for relatively small amounts of treatment capacity. Faulty and leaking systems threaten to pollute neighboring properties, surface waters, and groundwater. When these systems are the source of pollution, they are difficult to identify and remedy in an efficient manner. They also have limited lifetimes, forcing any future property owner or governmental entity to deal with the removal and remediation at the time.

Further, the Future Land Use Map's designation as a "Developing" area emphasizes the need for providing services. The expected services for Developing areas specifically includes sewer service. As this area develops, not only will additional wastewater capacity be needed, the ability to rely on septic or on-site management systems is reduced, while the threat of failing systems on neighboring properties increases.

ORK asks that wastewater treatment at this development is only served by interconnection into the City of Statesboro system. The conditional use permit should specifically disallow on-site wastewater systems on this site under any circumstances.

2. Protect and preserve all on-site wetlands

Bulloch County should ensure that all the wetlands present on the site are sufficiently protected and preserved during this development process and into the future. As presented in the Conceptual Site Plan/Layout included in the DRI documents, the construction appears to fully avoid the wetlands present in the northern corner of the project. ORK appreciates that the construction plans have been designed to not impact the wetlands, as they provide important flood control, pollution filtration, and habitat functions in the area.

While wetlands do not appear to be impacted, ORK requests that Bulloch County specifically includes a condition that ensures non-impact to the wetlands as a result of this conditional use permit. A condition that states "No wetlands may be negatively impacted in any way during the construction and use of this property" would ensure these aquatic resources are protected moving forward.

3. Ensure stormwater management and prevent runoff pollution

As an industrial site with a variety of different automotive pollutants present, ORK urges Bulloch County to carefully plan to control all stormwater and runoff. Any stormwater plans, including but not limited to retention ponds, should take specific account for the variety of pollutants potentially present in the runoff and ensure that the systems can handle those pollutants without negative ramifications to neighboring properties or the environment. Likewise, ORK urges Bulloch County to ensure the most recent Coastal Stormwater Supplement guides stormwater controls.

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

Ben Kirsch, Legal Director
Ogeechee Riverkeeper