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

March 27, 2025

**Via E-Mail**

Coastal Regional Commission  
[planning@crc.ga.gov](mailto:planning@crc.ga.gov)

**Re: Comments on DRI #4412 - 7-Eleven New Development - Effingham County**

Coastal Regional Commission:

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 20 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 7-Eleven New Development project and its conditional use permit fall into three overarching categories. First, any decision at this stage would be premature with the incomplete site information and impact studies. Second, the flood hazard zone that cover the entirety of the property make this an exceedingly poor location for this development and should be the basis for rejecting this conditional use request. Third, additional explanation and serious layout reconsideration is needed to address foreseeable issues and concerns with the proposed development. Overall ORK urges Effingham County to deny this project as currently proposed.

**1. Incomplete site information prevents informed decision making and constructive public feedback**

The amount and variety of basic and important site information missing from the DRI application materials highlights the need to delay any decision until a fully informed decision can be made. Not only are Effingham County's decision-makers missing crucial information, but the public cannot provide constructive or meaningful feedback during this process. As such, ORK calls on the applicant to provide this missing formation to both Effingham County and share it with the public. Likewise, ORK calls on Effingham County to delay any decision until the information is provided and the public has a meaningful opportunity to provide comment.

Among the missing information is an updated “Area Requiring Special Attention” (ARSA) map, a traffic study, solid waste generation estimations, a wetlands delineation, and an explanation for an apparent property subdivision. The purpose of the DRI process is to consider the regional impacts from a potential development. These missing pieces of information all inform those potential regional impacts. Without it, a fully informed decision cannot be made. It also highlights the applicant’s seeming under-consideration of potential regional impacts. If basic site information such as solid waste generation and wetlands impact are not fully considered, it is hard to understand how the applicant took further steps to look at regional or even local area impacts.

This under-reporting of information leaves impacted communities and interested residents out of the review process. Sharing expected impacts and providing a comment period allows neighbors, communities, and interested parties not only the opportunity to provide feedback, but gives these people the information necessary to provide constructive feedback. Without the information, the public can only provide general opposition and a potential mutually agreeable resolution is not as easily reached.

In addition, specific water supply and wastewater treatment service plans are minimally addressed and necessitate further explanation. While Effingham County is the designated provider of both services, the plans are not clearly explained. The DRI announcement states that water supply will require less than a mile of piping to serve the site, but does not explain the source. Without existing infrastructure, as shown on the “Effingham County Water, Sewer, & Reuse” map available on the county’s website,<sup>1</sup> more detail is needed to describe the plans. The situation is even less clear for wastewater treatment. With Effingham County as the wastewater service provider, and with no existing infrastructure and no planned sewer extension, no information is provided about how Effingham County will provide wastewater treatment services. As will be discussed more below, the site’s presence in the floodplain will lead to flooding. Considering this, the development cannot rely on on-site or septic systems without risking inundation, flooding, and pollution risk. Likewise, it is unclear how Effingham County would be the wastewater treatment provider if an on-site septic system is used, as that would presumably be the responsibility of the developer and/or property owner. The information provided for water supply and wastewater demand is insufficient to meaningfully provide comment and should not be the basis of a conditional use permit.

As presented here, this development is not ripe for consideration, let alone approval. Crucial information is missing, which leaves the public out of the conversation. Until the applicant can provide this information to both Effingham County and the wider public, ORK calls on Effingham County’s decision makers to table any permitting or approval decision.

## 2. Flooding hazards present serious risks to developments on this property

The proposed development’s location wholly within the floodplain highlights poor site selection and should not receive a conditional use permit. The risks from flooding, including property damage and pollution, are serious and increasingly likely to occur. These threats from flooding underscore the risk at this location for the proposed

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<sup>1</sup> Effingham County. “Effingham County Water, Sewer, & Reuse.” Available at: <https://www.effinghamcounty.org/DocumentCenter/View/617/Map-of-the-Effingham-County-Water-Sewer-and-Re-Use-System-PDF?bidId=>

development and cannot be overlooked in Effingham County's decision-making process. ORK calls on Effingham County's decision makers to deny the conditional use request and any of the proposed development.

Flooding is unavoidable at this location and should be the basis for denying this conditional use permit. Alarming, the entirety of this proposed development is in the Federal Emergency Management Agency's (FEMA) designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone AE. While the "100-year floodplain" name implies that floods will only occur once every 100 years, this obscures the actual risk. Over 30 years, the actual flood risk is 26%<sup>2</sup> - a more than 1 in 4 chance for properties in the 100-year floodplain.

Additionally, the "100-year floodplain" looks narrowly at only the "base flood." The base flood describes the strength of flood that is 1% likely to happen in any year.<sup>3</sup> Non-base floods, i.e. floods less strong or severe than the base flood (aka the "100-year flood") are more likely to happen each year. Likewise, the 100-year flood is not the absolute strongest possible flood that the property could face. The narrow focus on the 100-year flood not only undercounts the potential frequency of flooding on the property but also underconsiders the severity of flood the property could experience. Further, reliance on the backwards-looking 100-year flood model further obscures risk. The estimated floods and the extent of the floodplains relies on historic data, leaving out the most recent and most representative data. With the anticipated increase to storm frequency and intensity in the coming years and decades, the extent, size, and frequency of flooding on this property is greater than the Flood Hazard area anticipates.

Effingham County should also take into account the potential financial burdens related to flooding prior to approving the proposed conditional use and development. Those financial burdens include, but are not necessarily limited to property and structure damage, water and land pollution, and buyout costs. At the most basic level, flooding threatens to inundate, damage, and destroy any structure in its path. Structures within the floodplain see their risks increase. Costs of clean up, collateral damage, and to neighboring properties should be considered. Flooding also presents water pollution threats. The gasoline and diesel fuels present the risk of spilling during flooding. Likewise, other remnant automotive-related pollution from frequent car and truck traffic risks being swept up in flood waters. Finally, the proposed use of on-site septic and sewage management presents another source of pollution during inundation and flooding. The nearby Ogeechee River and its tributaries are the principal water bodies threatened by these pollution risks. Finally, if flooding occurs frequently enough, FEMA may offer a property buyout to return the property to its now-current conditions. These buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government.<sup>4</sup> This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs will fall on the County. ORK urges Effingham County to specifically consider and factor in these foreseeable financial costs of building in the floodplain when making its decisions.

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<sup>2</sup> See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

<sup>3</sup> FEMA. "Appendix B: How to Read a Flood Insurance Rate Map (FIRM) Course Glossary". Available at: [https://emilms.fema.gov/is\\_0273/groups/157.html](https://emilms.fema.gov/is_0273/groups/157.html)

<sup>4</sup> FEMA. "FACT SHEET: Acquisition of Property After a Flood Event." Available at: <https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event>

3. The proposed layout and Site Plan need reconsideration and further justification

If Effingham County decides to generally move forward with the conditional use permit and further development, the Site Plan needs significant revisions to better ensure long-term resiliency. Specifically, reconsideration and clearer justifications for site layout selection, wetland delineation on the Site Map, and a reconsideration of wastewater treatment services will begin to address some of the foreseeable issues with developing the site. ORK calls on Effingham County to delay a decision until these revisions are made. Additionally, any permit approval and future construction or development action should be conditioned on first revising the Site Plan.

Clearly communicated justification for and reconsideration of the site's proposed layout in the Site Plan is urgently needed. As currently presented, the Site Plan only displays around 50% of the property parcel<sup>5</sup> included in the CRC's public notice. This limited view of the available development space limits potential alternative layouts for the site. It also is unclear whether the property will be subdivided or what will happen with the remaining portion of the property under the current proposed action. Development options on the southwestern portion of the property not included in the Site Plan have the potential to be less impactful, especially to wetlands. ORK calls on the developer to explain why that portion is not being utilized.

In addition, the wetlands present on the site are wholly missing from the Site Plan map. The northeastern portion of the property, which is currently proposed for development, contains the entirety of the wetlands present on the site - at least 5 acres.<sup>6</sup> However, without representation on the Site Plan map, it is more difficult to directly see the impact from the proposed layout. Wetlands delineation will better allow for less impactful alternative layouts to be readily considered. ORK calls on Effingham County to delay any approvals until a wetlands delineation is included.

Finally, the apparent use of on-site wastewater management systems needs serious reconsideration. First, as discussed above, the site's presence in the floodplain risks flooding and pollution both onto neighboring properties and nearby water bodies. On-site septic cannot be the planned wastewater treatment approach. Second, as proposed, it appears that the septic drainfield would be located in a wetland. Not only will this strain any habitat and water quality values that they currently provide, the wetlands also represent the location and direction that stormwaters naturally flow on the site. Placing the drainfield in the path of stormwater drastically increases the risk of floods carrying undertreated wastewater off site, onto neighboring properties, and into nearby water bodies. ORK urges Effingham County to require the applicant to reconsider its wastewater plans altogether.

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>5</sup> Property Card for Parcel 03290041Boo. Available at:  
<https://qpublic.schneidercorp.com/Application.aspx?AppID=666&LayerID=11348&PageTypeID=4&PageID=4716&KeyValue=03290041Boo>

<sup>6</sup> See Attachment A

## **Attachment A**

U.S. Fish and Wildlife Service's  
National Wetlands Inventory  
for the  
7-Eleven New Development



LEGEND

- BASEMAPS >  
MAP LAYERS >
- ☒ Wetlands
  - ☒ Riparian
  - ☐ Riparian Mapping Areas
  - ☒ Data Source
    - ☐ Source Type
    - ☐ Image Scale
    - ☐ Image Year
  - ☐ Areas of Interest
  - ☐ FWS Managed Lands

**General** Description Reports About

This **11.49 acre Freshwater Forested/Shrub Wetland** habitat is classified as a **PFO1C**. For a complete code description, click [here](#).

The wetlands and deepwater habitats in this area were photo interpreted using **1 meter (or less) digital, color infrared** imagery from **2007**. Click [here](#) for project specific mapping conventions and information.

[Zoom to wetland](#)  
[Zoom to project area](#)

