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

April 30, 2025

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov
912-514-1593

Re: Comments on DRI #4421 - McClendon Planned Development - Savannah

Dear Ms. Lewis:

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

ORK's comments on the McClendon Planned Development (PD) fall into three overarching categories. First, a clearer presentation of the aquatic features and resources that currently exist on-site is necessary to ensure that a resilient, low-impact layout is selected and approved. Second, robust stormwater management is essential to establish during this planning stage and needs to be presented in specific detail. Third and finally, further clarification from the applicant and developer is needed as it relates to the planned commercial development as well as its planned water supply and wastewater treatment demands. These concerns should be addressed prior to any decisionmaking processes to ensure that those decisionmakers are fully informed about the site. Until all of the pertinent information is provided, ORK urges a delay on any vote for annexation, rezoning, or permitting related to this development.

1. Aquatic features and resources should be overlaid on maps and planning documents

To ensure that the relevant site-specific information is directly conveyed and easily understood, the aquatic features and resources on the property should be displayed on the relevant maps and planning documents. With these details presented clearly, the decisionmakers will be more informed and better equipped to make the most beneficial decision for the community about how development should occur on the site.

Wetlands and floodplains should be overlaid on the General Master Plan and other relevant planning documents. While the General Master Plan does denote where wetlands will be left unimpacted, the map fails to show where wetlands are planned to be filled or otherwise impacted. As noted in the DRI submission materials, the applicant and developer anticipate affecting wetlands.[1] Simply noting where wetlands will be impacted by the proposed layout better represents those anticipated impacts and gives the decisionmakers a clearer picture of the proposed development's ramifications. The same applies to the floodplains present on the property. Despite the DRI submission materials stating there would be no effects to floodplains, the northwest portion of the property contains a swath of the 100-year floodplain (Flood Zone A) that appears to overlap planned residential space. By simply overlaying the floodplain, these questions can be quickly addressed and alternative layouts can be more readily presented by the decision-makers.

In addition to the overlay, anticipated wetland impacts should be clearly summarized by the applicant and developer in a wetlands plan. Nowhere in the DRI submission documents is the total amount of impacted wetlands, justifications, or mitigation efforts communicated. This information should be presented to the decisionmakers. The plan should include specific explanations of why wetlands are being impacted, why avoidance is impossible, and mitigation efforts around those impacts should be communicated.

In summary, ORK asks that:

- Aquatic features and resources, specifically wetlands and floodplains, are overlaid on all relevant development maps and documents; and
- An overarching wetlands plan details the anticipated impacts, justifies those impacts, and explains planned mitigation efforts.

2. Resilient stormwater management should be central to site planning and layout

Stormwater management should be a central consideration during this planning stage. The extensive wetlands, floodplains, and other aquatic features located on this site necessitate careful planning to sufficiently address stormwater management and ensure long-term resiliency. ORK strongly urges the decisionmakers to demand sufficient assurances and explanations that stormwater management has been fully considered and addressed before approving this proposed development.

As noted in the DRI submission documents and the accompanying Green Infrastructure Map, portions of the proposed development are located in the Federal Emergency Management Agency's (FEMA) designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A/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%[2] - a more than 1 in 4 chance for properties in the 100-year floodplain**. Additionally, the "100-year floodplain"

[1] https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4421
[2] *See* https://savannahga.gov/FAQ.aspx?QID=332 and https://www.floodsmart.gov/flood-zones-and-maps

looks narrowly at only the "base flood," which is a strength of flood that is 1% likely to happen in any year.[3] 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 geographic extent of the floodplains rely on historic data, leaving out the most recent and most representative data. As rain events become stronger and more frequent, the base flood will also become stronger and have a greater reach. Because flooding is anticipated to become more frequent and has been occurring in non-floodplain locations, ORK urges the decisionmakers to be forward-looking and go beyond minimum required standards, ensure sufficient long-term stormwater management, and prevent any structure from being built in the 100-year floodplain.

To ensure forward-looking and resilient stormwater management, go beyond the minimum required management standard for the proposed storm ponds. Increased stormwater pressure can quickly lead to flooding issues on the proposed PUD property and onto neighboring properties. With storms becoming more frequent, previous stormwater processing calculations are less intensive than the storm ponds will likely be required to retain and process in the coming years and decades. To extend the functional lifetime of these storm ponds and to successfully prevent flooding, ORK urges the developers and decisionmakers to go beyond minimum standards in constructing these stormwater features. To achieve this, ORK suggests basing management and construction on the 100-year and/or 500-year storms. Currently, the Savannah area's 100-year storm would add 10 inches of rain in a 24-hour period, with the 500-year storm raining 20 inches in 24 hours.[4] It is important to note that these storms are understood to be smaller than recent data show and future estimates predict, as the current NOAA calculations are based on 2016 data.[5] To extend the functional life of these features in protecting the area from flooding, ORK urges the decisionmakers to require stormwater features to retain 125% of the 100-year storm[6] or 100% of the 500-year storm.

Finally, impervious surface cover should be minimized to reduce increased stormwater pressure. A reduction to the 45% impervious surface cover should be a primary concern, as impervious surfaces both speed-up stormwater and prevent infiltration into the ground, placing greater strain on existing stormwater infrastructure and creating potential issues for neighboring properties. Green infrastructure[7] like bioswales[8] and pervious pavement[9] can help reduce the percentage of impervious surface cover and the associated stormwater pressure it creates.

In summary, ORK asks that:

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[3] https://emilms.fema.gov/is_0273/groups/157.html
[4] https://www.savannahga.gov/FAQ.aspx?QID=329
[5] *See* UGA (https://site.extension.uga.edu/climate/2020/05/has-the-100-year-storm-changed-over-time-it-may-depend-on-where-you-are/) and Dudek Consultants (https://dudek.com/will-your-flood-control-system-work-in-a-100-year-event/).
[6] 125% of a 10 inch storm is 12.5 inches.
[7] EPA Green Infrastructure explainer https://www.epa.gov/G3/why-you-should-consider-green-stormwater-infrastructure-your-community
[8] Bioswales https://nacto.org/publication/urban-street-design-guide/street-design-elements/stormwater-management/bioswales/
[9] Pervious Pavement https://nacto.org/publication/urban-street-design-guide/street-design-elements/stormwater-management/pervious-pavement/

- Stormwater management is centered in the planning process;
- Long-term and resilient stormwater management planning considers increasing storm intensity and frequency;
- No new structures are built within the 100-year floodplain;
- Storm pond capacities go beyond the minimum requirements to ensure long-term, resilient functioning; and
- Impervious surface is reduced to minimize strain on stormwater facilities.

3. Clarification needed for planned commercial development and for water utility services

The applicant and developer needs to clarify its plans for commercial development on this property. Likewise, the applicant must confirm that water supply and wastewater treatment capacity actually exists for this site.

The General Master Plan does not show any planned commercial areas for the proposed site. Despite being completely missing from that Plan document, the DRI submission documents note that 30,000 square feet of commercial space is planned for the site. ORK asks for clarification on this point, and that the decisionmakers are fully informed on this question. Further, if no commercial space is being planned for the development, ORK questions why a PD is being pursued over a different residential zoning and asks the decisionmakers to consider whether that is the most beneficial zoning for this development.

Finally, ORK asks that the applicant, developer, or City of Savannah provide confirmation that water supply and wastewater treatment capacity exists for this site. Nearly half a million gallons per day (0.45 MGD) of both water supply and wastewater treatment demand is significant. In this water supply-limited region, these confirmations are essential for ensuring the site, if built, can actually be occupied.

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