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

May 21, 2025

Via E-Mail

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

Re: Comments on DRI #4453 - Transfer Station - ABC Waste

To whom it may concern:

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 ABC Waste's proposed transfer station focus on two overarching topics - stormwater management and wetlands protections. Through proactive planning at this early and preliminary stage of development, ORK is hopeful that our concerns can and will be fully considered and properly addressed before approval of the requested special use permit.

Stormwater management and flooding should be the central consideration in planning this development. The entirety of the property is located in Flood Zone AE, as shown on the Green Infrastructure Map included in the DRI Public Notice. This Special Flood Hazard Area, also known as the "100-year floodplain," highlights how flood-prone the property is - a 26% chance¹ of facing the 100-year flood in the next 30 years. With storm frequency and intensity expected to increase in the coming years and decades, this risk is likely to increase. The City of Savannah must ensure that this proposed development sufficiently anticipates and mitigates any risks from flood on this site. As a waste transfer station, flooding could easily pollute nearby properties and waterways. ORK urges the City of Savannah to require specific special use permit condition that direct the developers to ensure that the flooding this site will likely experience is properly planned for and will not create off-site harms to neighbors, waterways, or the City..

¹ See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

Wetlands present on the site, likewise, should be fully protected. The Green Infrastructure Map indicates wetlands are located on the property. Without a conceptual map or site plan included in the DRI Public Notice, it is not clear to what extent these resources will be impacted beyond the “likely” impacts noted in the applicant’s Additional DRI Information.² Wetlands play an important role in both flood mitigation and pollution filtration - both of which are concerns at this site. Considering these important roles, wetland filling should be wholly avoided. ORK urges the City of Savannah and the developer to avoid any impacts to wetlands on this property. If wetlands filling cannot be avoided, ORK asks that the developer justify this conclusion, denote where wetlands will be impacted, and explain mitigation plans. Further, wetland mitigation plans should preferably occur onsite or as close to the property as possible, as to reduce to the increased stormwater and pollution pressure on the area immediately surrounding the proposed site.

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

² <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4453>