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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

June 30, 2025

Via E-Mail

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

Re: Comments on DRI #4485 - Blue Heron Development

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 the Blue Heron Development seek to address issues related to stormwater, flooding, and wetlands. The property encompasses a large floodplain and this, coupled with new impervious surfaces and lost wetlands, increases flooding and stormwater pressure on this site. It is also a potential problem for neighboring properties.

Likewise, the significant amounts of wetlands on the site call for careful planning decisions to preserve, mitigate, and protect these important aquatic resources. To avoid foreseeable flooding pressure and further aquatic resource loss, ORK calls on the developers, Metropolitan Planning Commission (MPC), and the City of Savannah to take proactive steps to plan for the future, which include avoiding construction within the floodplain, going beyond minimum stormwater and flood damage prevent requirements in order to strengthen the site's long-term resiliency, and drafting and approving a wetlands mitigation plan. ORK urges the MPC and City of Savannah to include all conditions, including but not limited to, the suggestions below, that are necessary to ensure the site's safety amid growing storm and flood threats.

1. Flooding and stormwater management - long-term vision needed

Resilient planning, design, and construction is an increasingly important consideration in all developments throughout Savannah and Chatham County. Significant storm events are becoming both stronger and more frequent. As a result of these strengthening storms, flooding is becoming a more frequent and significant problem throughout the City and County. Regional development, which adds impervious surface and removes the assimilative capacity of wetlands, only adds to stormwater management and flooding pressure. To ensure this site will remain usable in the coming years and decades, and **does not become a burden to future owners, neighbors, and local governments**, the MPC and City of Savannah should require long-term, resilient planning, design, and construction at this crucial first stage of development.

Based on the information included in the DRI notice and documents, there does not appear to be any critical consideration of site-specific stormwater management needs to prevent flood damage. Compliance with state and local standards are the absolute minimum, and their inclusion as the apparent extent of stormwater and flooding consideration raises the need for additional conditions and requirements.

Flooding will be an unavoidable concern on this site, given the significant presence of floodplains. As included in the DRI documents and the accompanying Green Infrastructure Map, a large portion of the proposed development is located in the Federal Emergency Management Agency's (FEMA) Zone AE, designated as a 1% Annual Chance Flood Hazard area and also known as the 100-year floodplain. 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%¹ - 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," which is the strength of a flood that is 1% likely to happen in any year.² 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 fails to consider the severity of flood the property could experience. Further, reliance on the backwards-looking 100-year flood model 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, to prevent unnecessary risks from flooding, ORK urges the MPC and Savannah to **prevent any structure from being built in the 100-year floodplain.**

To better prepare for intensifying and more frequent storming and flooding, stormwater and flood damage prevention designs should go beyond the required minimums. First, the development should be conditioned on **reducing post-construction runoff**, rather than just ensuring no additional runoff compared to pre-construction amounts. This will help to offset stormwater pressure from stronger storms. Second, **increasing stormwater retention/detention ponds capacity** should be increased. As one of the main mechanisms to control post-construction runoff, these ponds capacities are important. In anticipation of increasing storm strength, requiring these ponds to be

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

² https://emilms.fema.gov/is_0273/groups/157.html

able to assimilate 125% of the 100-year storm³ or 100% of the 500-year storm. Third, to reduce stormwater management pressure, **impervious surface cover should be reduced** wherever possible. This can be achieved through actual reduction in cover, through the use of pervious pavement, or in any other proven way. Fourth, to respond to expanding floodplains, the MPC and the City should **implement a floodplain buffer**, such as a 25-ft buffer from the edge of the 100-year floodplain. Building a buffer into the development process ensures that, as storms strengthen and floodplains are revised, flooding risk will not increase for structures. Through these suggested requirements, the City of Savannah will ensure that this site remains resilient to future floods, not just to current flooding conditions.

In summary, ORK asks that:

- Flooding and stormwater management receives its due attention and consider the specific of this site in its design, planning, and construction;
- No structures are built within the 100-year floodplain (Zone AE), and that a condition is added that creates a buffer from the existing floodplain in anticipation of future floodplain expansion;
- Post-construction stormwater runoff is reduced compared to pre-construction numbers, whether through reductions in impervious surface coverage or any other method; and
- Stormwater retention/detention ponds' minimum capacity is increased beyond the current minimums.

2. Wetlands - preservation, mitigation, and protection

Wetlands are a quickly-dwindling resource in Savannah and Chatham County that necessitate additional attention in this and every development. While the Conceptual Land Use map⁴ is useful in showing where the wetlands are located and how the structures will impact those wetlands, the analysis provided in the DRI notice and associate documents is not sufficient. More precise analysis and discussion is needed to ensure these beneficial aquatic resources are properly preserved, sufficiently mitigated for, and otherwise protected.

The information shared in this DRI notice fails to show that the development plans sufficiently consider wetland impact. This starts with the basic calculations of the amount of wetlands and uplands⁵ compared to the whole site⁶ shows almost an entire acre of difference. Beyond these inconsistent calculations, little more is discussed about wetlands beyond the statement that “most” will be preserved and that the U.S. Army Corps will need to permit the wetlands that will be filled. ORK is concerned by the lack of discussion coupled with inconsistent numbers.

³125% of a 10 inch storm is 12.5 inches. <https://www.savannahga.gov/FAQ.aspx?QID=329>

⁴

https://files.constantcontact.com/4e8f857f201761199ab-c1ba-4b7c-b1e1-b568e71d7f3d.pdf?_gl=1*nrwy22*_gcl_aw*RoNMLjE3NTAxMDgwOTMuQ2p3SoNBandnYl9DQmhCTUVpdoEwcDNvToNlaG41bWVjSXNfNWVYU2tSbG85ZkxpRUUpQSDBaafPQzhUZo9oWmtuT3pMeDRCWjN2SWN4boM5bUIRQXZEXoJ3RQ..*_gcl_au*ODcyMzUwOTg5LjE3NTAxMDgwODE.*_ga*OTdiZDQ3MTgtNWVmNyooMTkyLThmM2ltZmFIMGYzNzkxNDQo*_ga_14T5LGLSQ3*_czE3NTAyNTcwMjUkbzEvJGcxJHQxNzUwMjYxMjE2JGoyNyRsMCRoMA..

⁵Wetlands = +/- 32.35 acres; Uplands = +/-32.17 acres – combined is +/- 64.52 acres

⁶ 63.88 acres total

Additional analysis and consideration should be put into the significant wetlands on the site. First, any **preparatory actions or construction should be delayed** and conditioned on first obtaining all required wetlands permitting. If wetlands fill is required for this development, and if the permits are not issued, the site risks irreparable damage from clearing trees and grading the site for no reason. To prevent this avoidable outcome, activities should not begin until permits are issued. Second, wetland impacts should be more clearly considered and described by the developers in a **robust wetlands plan**. This should include not only the total number of wetlands impacted by the structures, but impacts anticipated by other necessary and anticipated construction, including but not limited to road construction. Beyond this, the wetlands plan should justify why the total amount of wetlands fill is necessary and describe the efforts made to reduce wetlands fill where possible. Third, the MPC and Savannah should consider requiring **wetland mitigation projects** to reduce the damages from any filled wetlands. These projects should be prioritized to occur onsite, if possible, or as close to the site as possible if onsite mitigation cannot occur. This ensures that the local area, which would lose the wetlands and their environmental services, will see the benefits of the wetlands mitigation projects.

In summary, ORK asks that:

- Wetlands preservation, mitigation, and protection receives more detailed analysis;
- No preparatory action or construction activities occur until all required permits are obtained;
- A robust wetlands plan clearly lays out and justifies where, why, and how many acres of wetlands are being proposed to be filled; and
- Mitigation projects are required either onsite or as close to the site as possible.

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