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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

January 28, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4595 - Sassy Ridge Concrete Plant

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 Sassy Ridge Concrete Plant project's rezoning fall into three overarching categories. First, the site's location in both wetlands and the floodplain makes it poorly suited to any sort of permanent development and is especially ill-suited for industrial developments. Second, the site's location in close proximity to residents, other businesses, recreators, and a house of worship and its incompatibility with long-term comprehensive planning documents raise serious concerns about the location. Third and finally, the information and answers provided in the DRI Information Forms raise factual and completeness concerns. For these reasons, Ogeechee Riverkeeper urges Liberty County to **DENY** the rezoning as well as any construction, building, or operation permitting sought for this development.

1. Flooding risks and hazards should prevent the requested rezoning, construction, and operations

The proposed location for this development faces serious and sustained flooding risks. Its presence almost entirely within the FEMA-designated floodplain highlights the site's poor location. Combined with the significant wetlands present on the site and the estimated 75% impervious surface cover proposed, flooding will be an issue that is unlikely to be successfully mitigated by any amount of stormwater detention ponds. As such, and with the specific risks stemming from this proposed development, Liberty County should deny rezoning and permitting this project.

Flooding is very likely at this location, justifying a denial of the request rezoning and any related construction or operating permits. As seen in the Flood Zones Map,[1] more than half of the property is located within the Federal Emergency Management Agency's (FEMA) designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A.[2] 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%[3] - a more than 1 in 4 chance for properties in the 100-year floodplain over that time period.

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.[4] 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 flooding 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 in storm frequency and intensity in the coming years and decades, the extent, size, and frequency of flooding on this property is likely greater than the Flood Hazard area anticipates.

The wetlands on the site further indicate that water will be a sustained issue. According to the Coastal Region Commission's Wetlands Map,[5] roughly three-fourths of the property contains wetlands. This map may be an underrepresentation, as non-highlighted portions also contain symbols indicating the presence of wetlands. Regardless of whether wetlands are present on 75% or 100% of the property, their presence suggests that waters tend to pool on this property at and around these features. This tendency to pool needs to be considered when planning and developing this industrial site. These topics should not be left to be determined in the future, after rezoning and permitting has already taken place.

Flooding issues are particularly concerning for concrete plants. Of principal concern are the production-related sediments that will be unavoidably present on the site. Both the storage of precursor materials and the deposition from production itself will end up on the property, which would be covered in 75% impervious surface. Intense storms threaten to quickly wash this onto neighboring properties and into nearby waterways, including Mt. Hope Creek, and other aquatic features. Even when functioning perfectly, a stormwater detention pond could quickly become overloaded with the ingredients for concrete and become ineffective. These concerns do not include any other chemicals or other pollutants that might be present on this industrial site.

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[1] Coastal Regional Commission (CRC). "Flood Zone." *See* https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRIs%2FDRI%204595%20Sassy%20Ridge%20Concrete%20Plant%20%2D%20Liberty%2FDRI%204595%20%2D%20Flood%20Zones%20Map%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRIs%2FDRI%204595%20Sassy%20Ridge%20Concrete%20Plant%20%2D%20Liberty&p=true&ga=1

[2] Federal Emergency Management Agency (FEMA). " Zone A." *See*: https://www.fema.gov/about/glossary/zone-0.

[3] *See* https://savannahga.gov/FAQ.aspx?QID=332 and https://www.floodsmart.gov/flood-zones-and-maps

[4] Federal Emergency Management Agency. "Appendix B: How to Read a Flood Insurance Rate Map (FIRM) Course Glossary". *Available at*: https://emilms.fema.gov/is_0273/groups/157.html

[5] Coastal Regional Commission. "Green Infrastructure & Wetlands." *Available at*: crc4.sharepoint.com/Planning/_layouts/15/guestaccess.aspx?share=EbRpyhrWm8xMm2z7a4b2UWQBI8eQtUMjZjoebcuhFfVSUw&e=rRlpgn

Considering the likelihood of flooding on the site due to its presence in the 100-year floodplain and its aquatic features, as well as the polluting impacts from this flooding, ORK urges Liberty County to deny the rezoning and special use permit for this proposed development.

In addition, Liberty County should also take into account the potential financial burdens related to flooding. 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. As discussed above, gasoline and diesel fuels as well as other remnant vehicle-related pollution from frequent car and truck traffic risks being swept up in flood waters. The nearby Little Ogeechee River is the principal water body threatened by these pollution risks. Finally, if flooding occurs frequently enough, FEMA may offer a property buyout[6] to return the property to its now-current, undeveloped conditions. These buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government.[7] This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs would likely fall on the City. ORK urges Liberty County to specifically consider and factor in these foreseeable financial costs of building in the floodplain when making its decisions.

In sum, ORK suggests:

- Denying the proposed rezoning and any related permitting due to the proposed project's flooding and pollution risks,
- Anticipating the increasing likelihood of flooding above current FEMA maps and historic flooding events, and
- Strongly considering the pollution risks to nearby property owners, vulnerable ecological areas, and the Mt. Hope Creek from this proposed development due to the likelihood of flooding, and accounting for the potential, long-term financial burdens that the City might bear due to flooding, stormwater, pollution, and buyouts.

2. The proximity to other businesses, residents, and a place of worship is incompatible with Liberty County's Comprehensive Plan and is likely to cause quality-of-life issues

The proposed location will be problematic, beyond the flooding concerns raised above. Within a 1-mile radius of the proposed project, numerous residents, businesses, worshippers, and recreators will be forced to deal with the significant air, water, and noise pollution that unavoidably comes with a concrete plant. The proposed zoning and land

[6] University of Delaware Disaster Research Center and The Nature Conservancy. "Floodplain Buyouts: Challenges, Practices, and Lessons Learned." At page 9. August 2021. *Available at*: https://www.nature.org/content/dam/tnc/nature/en/documents/Buyouts_Lessons_Learned_Siders_Gerber_Chavez_TNC_Full_Report_2021.pdf

[7] Federal Emergency Management Agency. "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

use directly conflicts with both the Future Land Use Map[8] (FLU Map) and Character Areas Map[9] (CA Map) created after robust public input and planning efforts by Liberty County and its residents. These harms and the clear incompatibility with County planning documents should raise serious alarm with Liberty County and should prevent the requested rezoning.

Residents, businesses, and a house of worship will be harmed by this proposed use. Clusters of homes appear around Shavetown Lane and Sam Quarterman Drive, all well within range of air, water, and noise pollution. A number of businesses would be direct neighbors to the proposed concrete plant, less than 100ft away in some cases.[10] The rod and gun club[11] directly across N Coastal Highway is likely to see difficulty maintaining habitat for wildlife, and a farm[12] located north of Sam Quarterman Drive will face similar impacts to their livestock, animals, crops, and other products. Finally, a church[13] is roughly 1100 feet away from the proposed concrete plant. These current and existing uses will likely face issues related to this concrete plant if it is rezoned and permitted.

While the general land uses listed above - residential, recreational, agricultural, religious, and commercial - all fit within the expectation of the FLU Map and CA Map, the industrial use proposed here is incompatible, obstructive, and will stick out like a sore thumb. The Future Land Use designations around the proposed location are predominately "Agriculture/Forestry"[14] and "Residential Low-Density,"[15] both of which directly oppose the kind of industrial development proposed. Even the more forgiving "Commercial"[16] areas highlight the need for "compatibility with adjacent uses" and directs "not adversely impacting surrounding residential areas." This incompatibility is seen further in the Character Area Map, which designates this area as "Agriculture/Farmland,"[17] "Rural Residential,"[18] and "Scattered Residential."[19] The recommended development patterns for these three areas all fail to mention anything close to the industrial development proposed here. Liberty County's future planning document not considering or allowing for industrial development in this area. As such, ORK strongly urges Liberty County to follow these planning documents, maintain character areas, and deny this rezoning and any related permitting.

In sum, ORK suggests:

- Closely considering the impacts of the proposed land use on the current adjacent and nearby land uses; and
- Denying the proposed rezoning due to its incompatibility with both the FLU Map and CA Map;

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[8] Liberty County. "Liberty County Joint Comprehensive Plan 2025" (*hereinafter* 2025 Comp Plan). Future Land Use Map, at page 35. *Available at*: https://thelcpc.org/wp-content/uploads/2025/06/Comp-Plan.pdf
[9] 2025 Comp Plan ." Character Areas Map, at page 46.
[10] SawGrass Industries appears to occupy the adjacent Parcel 234007 - https://sawgrassindustries.com/
[11] 17 South Rod and Gun Club - https://www.17southrngclub.com/
[12] Myrkwood Farms - https://myrkwoodfarms.com/
[13] The Embassy Chruch - https://theembassylife.org/
[14] 2025 Comp Plan, at pg 24.
[15] 2025 Comp Plan, at pg 34.
[16] 2025 Comp Plan, at pg 25.
[17] 2025 Comp Plan, at pg 45.
[18] 2025 Comp Plan, at pg 38.
[19] 2025 Comp Plan, at pg 38.

3. Factual issues and inconsistencies within the DRI forms and documents submitted in support of the rezoning require additional attention and clarification

A number of areas in the submitted documents seem to conflict with the proposed plans. Ogeechee Riverkeeper urges Liberty County to seek clarification on these topics before allowing any rezoning or permitting decision is finalized.

First are concerns around the stormwater detention pond being generally proposed. While both the DRI notice and the DRI Information Part Form 2 state that a detention pond is planned, that does not seem to be reflected in the Conceptual Layout. Nowhere in that concept plan is a detention pond included, reserved, or otherwise discussed. If the alarming 70% impervious surface cover is going to be attempted to be mitigated with a detention pond, it must be included in the plan from the very beginning.

Second are concerns around wetlands on the site. While the Conceptual Layout attempts to overlay wetlands and the planned construction, the boundaries of the wetlands included on the concept plan do not appear to match the wetlands as included in the CRC's wetlands map. Likewise, as noted above, it appears that the range of the wetlands present on the CRC's wetland map may extend further than denoted. Finally, where wetlands will be filled and the total acreage to be filled should be specified in detail.

Third are concerns around wastewater and its disposal. The applicant appears to state, in DRI Information Part Form 2, that there will both (a) be 300 gpd of wastewater created while also stating that (b) "There will not be any wastewater disposal." This in itself is contradictory. Further, the applicant states that (c) there is *not* sufficient wastewater treatment capacity available to serve this proposed project, but (d) provides no plans to address this lack of capacity. Applicant states there is an existing private septic system, but it is unclear (1) if it has the capacity to handle the wastewater demand, (2) if there is any additional demand that will need to be met, or (3) if it will be receiving any industrial wastewater, which a traditional septic system is unlikely to be able to handle. This requires significantly more information and scrutiny.

In sum, ORK suggests that Liberty County requires:

- Detailed stormwater detention pond plans to be fully explained and detailed;
- Wetlands to be more precisely mapped, and the impacts be fully calculated; and
- Wastewater demand and disposal plans be more clearly communicated and planned around.

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
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