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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

February 12, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4609 - US 301 South Redi-Mix Concrete and Asphalt 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 US 301 South Redi-Mix Concrete and Asphalt Plant project's rezoning and variance fall into two overarching categories. First, the site's location in 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, and schools and its incompatibility with long-term comprehensive planning documents raise serious concerns about the location. For these reasons, Ogeechee Riverkeeper urges Bulloch County to **DENY** the rezoning and variances sought, as well as any construction, building, or operation permitting sought for this development.

1. Flooding risks and hazards should prevent the requested rezoning and variances

The proposed location for this development faces serious and sustained flooding risks, even beyond what the attached maps indicate. Flooding, and its associated damages and pollution issues, will be an issue on this site. Given the heavy industrial zoning sought, this is an inappropriate site for the associated risks to neighboring residents, businesses, and natural areas around this site.

The extent of the floodplain does not truly reflect the risks present on the site. While the applicant's Site Map¹ and the CRC's Flood Zone map² reflect the most recent Federal Emergency Management Agency (FEMA) flood hazard area maps,³ neither indicate why the floodplain seems to abruptly stop along a straight line. The abrupt end of the floodplain reflects the "Limit of Study" undertaken in setting establishing the 2010 maps.⁴ It is very likely, if not certain, that the floodplain extends beyond this limit. An extended floodplain would likely following the river's path⁵ as indicated in both the applicant's Site Map and CRC's Flood Zone map. This floodplain could foreseeably occupy the the proposed footprints of both the asphalt and concrete plants as indicated in the applicant's Site Map, exposing both to flood risks. This is a serious risk not only to the project's property and operations, but to neighboring and nearby property as well as the natural, aquatic, and habitat resources in the surrounding area. As such, this project should not be utilized for the proposed heavy industrial activities. If this project does proceed, it is absolutely crucial that the applicant investigates and provides information on the extent of the floodplain beyond the "Limit of Study" line.

Discussing this further, flooding is very likely at this location, and justifies a denial of the requested rezoning and variances. FEMA's designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A,⁶ should draw specific attention. While the "100-year floodplain" name implies that floods will only occur once every 100 years, this obscures the actual risk. Over a 30-year period, the actual flood risk is 26%⁷ - a more than 1 in 4 chance for properties in the 100-year floodplain over that time.

Additionally, the "100-year floodplain" only looks narrowly at the "base flood." The base flood describes the strength of flood that is 1% likely to happen in any year.⁸ 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

¹ Coastal Regional Commission (CRC). "DRI 4609 Site Plan." See: <https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant%2FDRI%204609%20%2D%20Site%20Plan%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant&p=true&ga=1>

² CRC. "Flood Zone." See <https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant%2FDRI%204609%20%2D%20Flood%20Zone%20Map%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant&p=true&ga=1>

³ FEMA. Flood Data Viewers and Geospatial Data. Available at: <https://www.fema.gov/flood-maps/national-flood-hazard-layer>

⁴ See Attachments A and B below.

⁵ Georgia Flood Map Program designate this river as "Little Lotts Creek Tributary No. 12." See <https://map.georgiadfirm.com/floodriskviewer/>

⁶ Federal Emergency Management Agency (FEMA). "Zone A." See: <https://www.fema.gov/about/glossary/zone-o>.

⁷ See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

⁸ 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

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.

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 has increased impervious surface. Intense storms threaten to quickly wash this onto neighboring properties and into nearby waterways, including the tributary that crosses the property, 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.

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 Bulloch County to deny the rezoning and variances sought for this proposed development.

In addition, Bulloch 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 buyout⁹ 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.¹⁰ This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs would likely fall on the City. ORK urges Bulloch County to specifically consider and factor in these foreseeable financial costs of building in the floodplain when making its decisions.

In sum, ORK suggests:

- Considering the incomplete floodplain data available for the site in making any rezoning and variance decision,
- 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,

⁹ 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

¹⁰ 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>

- Strongly considering the pollution risks to nearby property owners and vulnerable ecological areas 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, and
- Conditioning any rezoning, variance, or other approval on the applicant conducting research and investigation of the extent of the floodplain beyond the “Limit of Study” line.

2. The proximity to other businesses and residents is incompatible with Bulloch 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 roughly 1-mile radius of the proposed project, numerous residents and their homes, students, as well as businesses and their employees will be forced to deal with the significant air, water, and noise pollution that unavoidably comes with concrete and asphalt plants. The proposed zoning and land use directly conflicts with both the Future Development Map¹¹ (FD Map) and Current Zoning Map¹² (CZ Map) created after robust public input and planning efforts by Bulloch County and its residents. These harms and the clear incompatibility with County planning documents should raise serious alarm with Bulloch County and should prevent the requested rezoning and variances.

Residents, students, businesses, and employees will be harmed by this proposed use. Within a 1-mile radius of the property, neighborhood and housing developments along Coley Boyd Rd, Brannen Dr, Cypress Lake Rd, Pine Tree and Scotch Pine Aves, and Langston Chapel Rd are all nearby. Both Langston Chapel Elementary and Middle Schools are slightly more than a mile away from the proposed plants. The close proximity to these homes and schools should be a major concern and consideration in siting any heavy industrial activity.

Neighboring properties will be the most impacted. The housing development planned at the end of Evelyns Rd (including the platted houses around Bald Cypress Ct. and Pin Oak Ln will be the direct neighbors - with some homes likely to be within 500 feet of the proposed concrete and asphalt plants. The current residents Lakeside Dr will also be exceedingly close to the proposed industrial activities, with many residents' homes within 1000 ft. Finally, a number of homebuilding companies¹³ are direct neighbors to this property and will have to share a driveway with the proposed

¹¹ Bulloch County. “Bulloch 2045: A Joint Comprehensive Plan for a Better Tomorrow” (*hereinafter* 2024 Comp Plan). Future Development Map, at page 85. Available at: <https://bullochcounty.net/wp-content/uploads/2024/04/COMP-PLAN.pdf>. See also CRC. “Bulloch County Future Development Map.”

<https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant%2FDRI%204609%20%2D%20Future%20Land%20Use%20Map%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant&p=true&ga=1>

¹² CRC. “Bulloch County Current Zoning Map.” (*hereinafter* “CZ Map”) See:

<https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant%2FDRI%204609%20%2D%20Zoning%20Map%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204609%20US%20301%20South%20Redi%2DMix%20and%20Asphalt%20Plant&p=true&ga=1>

¹³ These appear to be: (1) Southern Homes of Statesboro <http://southernhomesofboro.com/>, (2) Superior Homes of Statesboro <https://superior-of-statesboro.edan.io/>, (3) Dream Home Builders Of Swainsboro, and (4) AAA Discount Homes.

project. Numerous other business are also located across and along US 301 S. All of these residents, businesses, and employees will forced to deal with and be exposed to the heavy industrial activity that does not currently exist.

Further, the Heavy Industrial (HI)¹⁴ zoning sought by the applicants is incompatible with both existing land uses and Bulloch County's Comprehensive Plan. The property in question is currently zoned Highway Commercial (HC), as are the other neighboring and nearby business properties along US 301 S.¹⁵ Other neighboring zoning designations are R-25 and R-80. Bulloch County's Code of Ordinances seeks to ensure that HI zoned properties have "the least possible adverse effect on other types of activities which might be incompatible with manufacturing."¹⁶ A rezoning to heavy industrial would significantly interfere with these existing land uses, having some of the highest possible adverse impacts on the associated activities with those zoning.

These properties and their zoning designations all fit within the two predominate FD Map designations for the area - Suburban Neighborhood¹⁷ and Suburban Corridor.¹⁸ Suburban Neighborhood areas' intent is to "Enhance existing suburban neighborhoods and create new suburban neighborhoods with a sense of place and community." Similarly, Suburban Corridor areas' intent is to "Enhance existing suburban corridors with an increased sense of place and community." Neither of these FD designations envision HI zoning, or even Light Industrial zonings. The proposed rezoning, therefore, directly conflicts with the long-term planning that Bulloch county residents and elected officials collaboratively created in its 2024 Comp Plan, going against its spirit, and potentially requiring a comprehensive plan amendment to maintain compliance.

Finally, the need for variances further highlights the poor location this property presents. While the exact variances sought are not included in any of the DRI public notice information, the need for the variances highlights that this type of development is not well-suited for the property and the location. Heavy industrial activity is usually restricted to proactively selected HI-zoned properties in order to avoid the need for variances. It also informs current and prospective land owners of what times of activities will occur. The need for variances further highlight, in addition to conflicts with zoning and FD maps, the poor location this property presents for the type of land use sought.

In sum, the incompatibility with current zoning, future development designations, and the need for variances highlight the potential harms to neighboring and nearby residents, students, businesses, and employees. As such, ORK strongly urges the Bulloch County Board of Commissioners to reject the requested rezoning, variances, and any other approvals sought for this project and to ORK strongly urges Bulloch County to follow these planning documents, maintain character areas, and deny this rezoning and any related permitting and to adhere to its planning documents, maintain its future development area designations, and maintain the current zoning.

In sum, ORK suggests:

¹⁴ Bulloch County Code of Ordinances. Appendix C - Zoning. Article 8 - Commercial and Industrial Districts. Section 801. Available at: https://library.municode.com/ga/bulloch_county/codes/code_of_ordinances?nodeId=PTIICOOR_APXCZO_ART8COINDI_S801PU

¹⁵ CZ Map.

¹⁶ Appendix C § 801. See FN 14.

¹⁷ 2024 Comp Plan, at pg 75.

¹⁸ 2024 Comp Plan, at pg 76.

- 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 FD Map and zoning designations.

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

Attachment A

Federal Emergency Management Agency's
Flood Insurance Rate Map panel
for the
US 301 S Redi-Mix Concrete and Asphalt Plant

Attachment B

Federal Emergency Management Agency's
Map Service Center
for the
US 301 S Redi-Mix Concrete and Asphalt Plant



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