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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

March 5, 2026

Via E-Mail

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

Re: Comments on DRI #4623 - Argyle Grove Planned 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 Argyle Grove Planned Development (PD) focus mainly on the interconnected issues of flooding, stormwater management, and natural resource preservation. The property's designation as a Special Flood Hazard Area, which has been borne out by the area's history of flooding, makes it a poor location for development and for future businesses, residents, and owners. Designations as core areas of Green Infrastructure and Areas Requiring Special Attention should not be overlooked and should be instructive in deciding whether to annex a potentially costly property into the city for the proposed development. Ogeechee Riverkeeper strongly urges the City of Savannah to not annex, rezone, and permit the proposed housing construction in this floodprone location for the sake of future residents and City resources.

1. Flooding will create risks for businesses, residents, and owners

Flooding will be an unavoidable and perpetual issue on this property. The Federal Emergency Management Administration (FEMA) 2018 Flood Map, as reflected in the Coastal Regional Commission's (CRC) Flood Zone Map for the

area designates portions of the property as a Special Flood Hazard Area.¹ Allowing housing to be placed in these areas necessarily creates real and growing risks for those future businesses, residents, owners, and Savannahians. The City of Savannah must consider these new housing construction projects in the real-world flood risk context before approving this or any proposed project. Ogeechee Riverkeeper opposes new construction in the 100-year floodplain and urges the City of Savannah to not annex, rezone, or approve any permits related to this proposed PD project.

Flood risks are growing in scope and severity. As in the CRC's Flood Zone Map, a large portion of the proposed development is located in the Federal Emergency Management Agency's (FEMA) Zone A, 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%² - a more than 1 in 4 chance for properties in the 100-year floodplain.**

Further, 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. **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 flood and geographic floodplains **estimates 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 City of Savannah to **prevent any structure from being built in the 100-year floodplain.**

These flooding concerns must be taken more seriously and be proactively addressed now, before any decision is made. As presented in the proposed Concept Plan, **every housing tract appears to contain Special Flood Hazard Areas.** This risk, however, is not included in any applicant-created document shared in the DRI notices, as the Concept Plan itself makes no reference to flood risk or floodplains. This suggests a backwards approach to planning - starting with a layout idea and then reactively trying to fit it onto the landscape. In flood prone areas like this property, **floodplains and other associated natural markers like elevation and wetlands, must be placed at the center of feasibility and planning conversations and considerations from the very beginning,** and cannot be an afterthought. The City of Savannah should not approve any annexation without first being provided information about and better understanding how flooding will impact the proposed development's plans.

The City of Savannah should also understand the **financial risks from annexation,** both to the City's taxpayers as well as to future businesses and homeowners. By annexing this property into the City, Savannah's taxpayers would be responsible for the City's flooding responses. This includes direct response costs related to rescues and other emergency services, debris clean-up, and condemnation-related costs from flood-damaged houses, among others. It also includes property buyouts. For frequently-flooded properties, FEMA may offer buyouts to property owners, in hopes of avoiding insurance payouts and allowing the property to return to its pre-development conditions. These

¹ FEMA maps

² See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government³ - a cost that Savannah's taxpayers could be expected to pay. When considering whether the property's annexation is a net positive for Savannah and its residents, the City must also consider these costs.

The City should also consider the foreseeable flood-related financial burdens to businesses, residents, and homeowners. If these structures are built, it is with the assumption that they will be occupied by someone. If these structures are built in the 100-year floodplain, the City of Savannah is stating, unavoidably, it is in favor and onboard with its future residents and businesses bearing that flood risk - a 26% chance of facing the 100-year flood over 30 years. The risks to future businesses, residents, and homeowners increase when considering less severe but equally damaging "non-base" floods. Flooding will impact structures built in floodplains - it is a question of when, not if. Ogeechee Riverkeeper sees the seriousness of flood risks that come with building within floodplains and urges the City of Savannah to see the same.

In summary:

- FEMA's 2018 flood maps designate significant portions of the property as Special Flood Hazard Areas,
- The likelihood of flooding is larger when considering the recent data, as well as the impact of "non-base" floods,
- These flood risks must be at the center of any planning or permitting decision from either the applicant or the City, and
- The City of Savannah must consider the financial risk to both the taxpayers and to the future businesses, residents, and owners of the homes and buildings.

2. Stormwater management should build in long-term resilience, including wetland preservation

Stormwater management is important for any development in Savannah and Chatham County, but is particularly important in floodprone areas. As noted above, the property's designation as a Special Flood Hazard Area necessitates careful consideration of how stormwater will be managed. As storms will intensify and occur more frequently in the coming years and decades, stormwater management will only become more important. As such, preservation of natural stormwater management, reduction to artificial and constructed stormwater intensifiers, and long-term resilience.

Stormwater management planning as reflected in the DRI notice and associated materials are inadequate. Discussion of stormwater management is limited to an estimate of post-construction impervious surface coverage and a promise to comply with the Georgia Stormwater Management manual and the Georgia Stormwater Coastal Supplement. This is not enough, even at this early stage. Now is the time to consider flooding and how stormwaters will be managed on the property. Not centering these fundamental considerations now threatens to make them afterthoughts. Proactive planning and concrete proposals should be discussed before annexation occurs.

³ <https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event>

Wetlands - natural and no-cost stormwater management - should be preserved throughout the property. These quickly-dwindling resources not only reduce stormwater flows, they retain water volumes, filter pollutants, and provide natural habitats for the region's fish and wildlife. All of these ecosystem services are invaluable and are freely available - so long as the City of Savannah and other governmental bodies and regulators do not allow developers to fill the wetlands and build atop them. When wetlands are filled, these services are lost and either have to be replaced with expensive and less effective artificial options or are not replaced and harm our shared places and natural resources. **Wetlands provide these ecosystem services regardless of the Army Corps' jurisdictional determination.** As such wetlands preservation should be the first step in stormwater management.

Further, the City of Savannah should seek clarification from the applicant on the question of wetlands impact by requiring the applicants to develop a separate wetlands plan. Failing to delineate and enumerate the wetlands present on the site obscures the actual impact that this development will have on the property's existing aquatic features. Failure to include wetland location on the Concept Plan, combined with the conflicting reports of "0 acres" of Total Wetlands in the Concept Plan and the clear presence and significant acreage on the CRC's Wetland Map, shows the applicant's lack of sufficient consideration of these wetlands in their planning. To address this apparent oversight, ORK asks the City of Savannah requires the applicant to create a wetlands plan that, at minimum, (1) clearly delineates all of the wetlands present on the property and enumerates the acreage proposed to be filled and preserved, (2) prioritizes and details how the development preserves the wetlands present on the site, (3) adjusts the General Development Plan and site layout to avoid wetland fill wherever possible, and (4) mitigates any lost wetlands with on-site mitigation or restoration efforts as close to the site as possible to reduce localized impacts.

Impervious surface coverage reduction should be the second step in reducing stormwater management pressure. Based on the applicant's estimate of 35% impervious surface coverage of the approximately 316.98 acre site, this proposal will create approximately **110 acres of new impervious surface**. These hard surfaces, like concrete and asphalt, prevent stormwater from infiltrating into the ground, where they can be absorbed. Impervious surfaces also speed up stormwaters, adding to management pressure. Finally, impervious surfaces hold pollutants and allow them to be washed into nearby waterways if not properly captured or treated. To reduce these issues, a significant reduction in impervious surfaces should be prioritized.

Following wetland preservation and impervious surface reductions, the developers should be required to build resilient and long-term stormwater retention/detention structures. 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 able to retain and assimilate 125% of the 100-year storm or 100% of the 500-year storm. Third, 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.

While these management practices will help to reduce stormwater pressure and flood risk, building structures within the 100-year floodplain, or Zones A or AE, will always bring flood risks. It is questionable whether any amount of mitigation will be able to fully remove flood risk if buildings are constructed in the floodplain. As such, Ogeechee Riverkeeper urges the City of Savannah to not allow any new construction in the floodplain.

In summary:

- Stormwater management considerations must be central to any decision on annexation, rezoning, and permitting undertaken by the City of Savannah,
- The current discussion of stormwater management, as reflected in the DRI notice and attachment materials, is inadequate,
- Wetland preservation should be prioritized for the broad-ranging and free environmental services it provides, and their presence on the site should be fully detailed in Wetlands Plan,
- A reduction to the 110+ acres of new impervious surface coverage should occur,
- Stormwater retention and detention features should be built above minimum standards to add long-term resiliency in light of anticipated increased storm frequency and intensity, and
- Despite these mitigation efforts, no structures should be built in the floodplain.

Thank you in advance for your time and consideration; please let me know if you have any questions or would like to talk further on these topics: ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper