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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

April 6, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4636 - Southern Atlantic Aggregates Asphalt Plant & Aggregate Yard

Coastal Regional Commission and Bryan County:

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 Southern Atlantic Aggregates Asphalt Plant & Aggregate Yard project fall into two overarching categories. First, the site's location adjacent to a stream and in the floodplain raises flooding and stormwater management concerns. Fugitive pollutants, especially from the industrial use proposed, should also be a key consideration. Second, wastewater management should be considered based on the proposed use. Ogeechee Riverkeeper urges Bryan County to carefully consider proposed site designs and layout plans in order to reduce flooding, fugitive pollution, and wastewater concerns.

1. Flooding risks and stormwater management should guide site design and layout

The proposed location for this development faces serious and sustained flooding risks. Flooding, and its associated damages and pollution risks, will be an ongoing and growing issue on this site. Given the heavy industrial use proposed for this site, careful site design and layout should consider and protect the neighboring residents, businesses, and natural areas around this site.

Flooding is very likely at this location. FEMA's designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A,¹ 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%² - a more than 1 in 4 chance for properties in the 100-year floodplain over that time.

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.³ 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 estimates of floods and the extent of the floodplains rely 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.

Riverine flooding is likely, drawing additional concerns. First, the river that flows along the western property boundary, as seen on the Coastal Regional Commission's ("CRC") Flood Zones Map,⁴ adds to flooding pressure. Rather than solely rain-based flooding, riverine flooding persists much longer. River-based flooding continues until river levels return to pre-flood levels. Rather than infiltrating the ground, rivers collect much more water and take longer times to disperse that collected water. Traditional stormwater management features, such as the proposed wet pond detention, cannot function as intended when fully inundated by riverine flooding. As such, Bryan County should ensure that the developers have fully considered and addressed the risks of riverine flooding in their stormwater management designs and facilities. The location within the 100-year floodplain and directly adjacent to a river calls for designs well above the minimum requirement.

Second, riverine flooding also adds pollution risks to the environment and to neighboring properties. The proposed aggregate yard use risks not only the saturation of those stored aggregates, but their pollution of the river and dispersal onto other properties. These fugitive pollutants can cause serious environmental harm and property damage. Bryan County should ensure that the site developer can successfully prevent flooding issues related to the aggregate storage yard.

Third, the adjacent river calls for sufficient buffering. The State of Georgia requires a minimum 25ft buffer from state waters. Given the industrial use proposed, as well as the risk of fugitive pollution, ORK encourages Bryan County

¹ Federal Emergency Management Agency (FEMA). "Zone A." See: <https://www.fema.gov/about/glossary/zone-0>.

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

³ 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

⁴ CRC. "Flood Zones Map." Available at:

<https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204636%20Southern%20Atlantic%20Aggregates%20Asphlat%20Plant%20%26%20Aggregate%20Yard%20%2D%20Bryan%2FDRI%204636%20%2D%20Flood%20Zones%20Map%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%2FDRI%204636%20Southern%20Atlantic%20Aggregates%20Asphlat%20Plant%20%26%20Aggregate%20Yard%20%2D%20Bryan&p=true&ga=1>

and the developers to consider and implement additional buffers to reduce pollution and flood damage risks to neighboring properties.

Site layout might help prevent the worst of these harms. ORK strongly discourages the construction of any structure in the 100-year floodplain due to the growing risk of serious flooding. Including a floodplain overlay on the Site Layout Exhibit⁵ will help to highlight those areas of greatest concern. Locating the aggregate yard in the least hydrologically-influenced portion of the property would also help to reduce fugitive pollutants from leaving the property. ORK urges Bryan County and the developers to center flooding risks in site design.

Finally, Bryan 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 buyout⁶ 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 Bryan County to specifically consider and factor in these foreseeable financial costs of building in the floodplain.

In sum, ORK highlights for further consideration:

- The future extent of flood risks on the property, as well as the limitation of the current estimating of flood risk,
- Whether wet pond detention can function as intended during riverine flooding,
- Design features, additional buffering, and intentional site layout to reduce flooding-related damages on the site, to neighboring properties, and to the natural environment, and
- The possibility of FEMA buyout costs that could be borne by Bryan County.

⁵ Thomas & Hutton. "Site Layout Exhibit - Southern Atlantic Aggregates Asphalt Plant & Aggregate Yard." Available at: <https://crc4.sharepoint.com/Planning/Planning/Forms/AllItems.aspx?id=%2FPlanning%2FPlanning%2FDCA%2FDRI%204636%20Southern%20Atlantic%20Aggregates%20Asphlat%20Plant%20%26%20Aggregate%20Yard%20%2D%20Bryan%2FDRI%204636%20%2D%20Concept%20Plan%2Epdf&parent=%2FPlanning%2FPlanning%2FDCA%2FDRI%204636%20Southern%20Atlantic%20Aggregates%20Asphlat%20Plant%20%26%20Aggregate%20Yard%20%2D%20Bryan&p=true&ga=1>

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>

2. Wastewater should be proactively considered

Specific attention should be given to how wastewater will be managed on the site. Industrial uses bring unique wastewater challenges. Asphalt and aggregates likely required different considerations than the current site use. As such, ORK urges Bryan County to consider wastewater management carefully.

The information included in the DRI states that the “[e]xisting on-site septic system”⁸ will be utilized for this new land use. First, Bryan County should require the developers to provide the County with the septic system’s specific location. If it is located within the 100-year floodplain, it risks inundation, failure, and the discharge of septage into the adjacent river and onto neighboring properties. Including the specific location also creates a record of its location, which will allow future County staff to locate it, should they ever need to. Second, if the existing septic system is not located in the 100-year floodplain, Bryan County should ensure it is suitable for the types of wastewater that it will be receiving from the new use. Third, the septic system should be serviced prior to its new use, and regular servicing should be required to ensure its proper functioning and to prevent septage leakage.

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

⁸ Department of Community Affairs. “DEVELOPMENT OF REGIONAL IMPACT DRI Information Form Part 2 - DRI #4636.” Available at: <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4636>