



PO Box 16206
Savannah, GA 31416
Phone/Fax: 866-942-6222

www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

March 14, 2023

Via E-Mail

Karen Saunds, Grant Specialist
Coastal Regional Commission of Georgia
ksaunds@crc.ga.gov

Re: Comments on DRI# 3930 Desnoyer Development

Dear Ms. Saunds:

Ogeechee Riverkeeper's (ORK) mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and use that information to amplify the voices of those who speak for the watershed. One of ORK's primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality.

The proposed rezoning of approximately 77 acres near Bloomingdale in Chatham County, as identified by the DRI#3930 maps and proposals submitted, raises specific concerns with regard to water quality and continued environmental degradation in the area that ORK wants to bring to the Coastal Regional Commission's attention.

1. **Stormwater Management** - Ogeechee Riverkeeper is concerned about the stormwater processing ability of this site as proposed. Currently, the properties seeking to be rezoned are largely undeveloped and, according to Chatham County Property Record Cards, host wetlands. With the developer reporting that around 65% of these properties will be covered with impervious surfaces, the environment's natural ability to retain and process water will be paved over. These hard surfaces will increase stormwater flows coming off the property. As this property and the surrounding areas continue to become more impervious, stormwater runoff will become more of an issue, degrading water quality in nearby waterways like the Little Ogeechee River. It is also more likely to increase flooding onto neighboring properties. In this increasingly industrially-zoned area, this stormwater runoff and flooding will likely contain harmful pollutants in addition to sediment. To address these foreseeable issues, proactive, conservation-minded efforts must be taken by the developer as they add more impervious surfaces to an increasingly-paved area. The vaguely stated plans for remedial actions "as required by local, state, and federal regulations" concern ORK. We strongly urge the developers to explain in greater

detail how the needed stormwater management considerations, like retention ponds and vegetative buffers, will effectively ensure water quality is not compromised.

2. Conservation and Areas of Significant Natural Resources - The properties here contain important ecological features that should be considered before being rezoned and open to industrial development. As noted above, the properties host wetlands, a quickly disappearing resource in this area. There also appears to be a lake on the property, though more details are not identified in Exhibit B's Question 7 or elsewhere in the included documents.

In addition, the Areas Requiring Special Attention (ARSA) Region Impact Maps show a large extent of the properties containing Areas of Significant Natural Resources. We urge a thorough review of the importance of these areas before rezoning them for industrial use and the accompanying degradation it is likely to cause.

3. Impact to Neighboring Areas - The rezoning decision should also carefully consider how this potentially industrial property will impact nearby properties. Of particular note are the residential areas immediately bordering the property, as well as Taylor Park. Despite minimal analysis provided in Exhibit B, the residential areas to the southwest of these properties noted in the application will certainly be affected by this rezoning. Flooding onto neighboring properties is likely to increase in frequency. Likewise, the recreational opportunities at Taylor Park are also likely to face adverse impacts from additional industrial activity.

Thank you in advance for your time and consideration; please let me know if you have any questions:

ben@ogeecheeriverkeeper.org or 866-942-6222 x9.

Ben Kirsch
Legal Director
Ogeechee Riverkeeper