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

May 3, 2023

Via E-Mail

Department of Natural Resources
One Conservation Way,
Brunswick, Georgia 31520
ATTN: Dillon Richter
dillon.richter@dnr.ga.gov

Re: Comments on Skidaway Institute of Oceanography's Application for a Coastal Marshlands Protection Act Permit for Maintenance and Installation of Mooring Dolphins, Skidaway River, Chatham County, Georgia.

Dear Mr. Kobs:

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.

ORK offers these comments on Skidaway Institute of Oceanography application for a Coastal Marshlands Protection Act permit. With the applicant providing the additional information requested below, the Georgia Department of Natural Resources can better ensure that coastal marshland, aquatic habitat, and the fish and wildlife that rely on them are not negatively impacted by the proposed action.

1. Explain Existing Pilings and Walkway Demolition Plans - The applicant's permit application provides very little information about its plans to remove existing pilings and walkways at the project site beyond mentioning their removal and identifying where they are located. ORK asks that the applicants provide more information about these plans to ensure that no adverse impacts result from their demolition.
2. Detail BMPs to be utilized - ORK requests that applicants provide a complete list of the best management practices ("BMPs") that it anticipates implementing for this action. In describing and explaining these expected BMPs, both the Georgia Department of Natural Resources and the public can be reassured that all activities will

not cause adverse habitat, water quality, or other environmental harms. This BMP identification and discussion should include BMPs for both installation and demolition activities.

3. Landfill and Hazardous Waste Site Identification - Applicants note on page 4 of the Project Description that “a review of the Hazardous Site Index for Chatham County, Georgia” was undertaken. It is unclear, however, whether this review was made by Chatham County or the applicants themselves. The Coastal Marshlands Protection Act directs the applicants to submit an inquiry to “the appropriate authorities,” who then, presumably, make the required review. Review by the applicant may be incomplete and unintentionally overlook relevant information not immediately or publicly available. ORK requests confirmation that Chatham County and any other appropriate authority has confirmed that the proposed project is not over a landfill or other hazardous waste site.

Thank you in advance for your time and consideration. If you have any questions regarding this letter, please contact ben@ogeecheeriverkeeper.org or 866-942-6222 x9.

Ben Kirsch
Legal Director
Ogeechee Riverkeeper