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[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

June 5, 2023

**Via E-Mail**

Karen Saunds, Grant Specialist  
Coastal Regional Commission of Georgia  
[ksaunds@crc.ga.gov](mailto:ksaunds@crc.ga.gov)

**Re: Comments on DRIs # 3992 - Hill-Durrence Tract 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.

ORK offers these comments on the warehouse development proposed for the Hill-Durrence Tract, owned by Gladys Hill and Joyce Durrence and to be developed by Wynn Cowan (the "applicants"). Overall, ORK recommends against permitting the Hill-Durrence Tract development at this time. Without a clear assessment of need, the nine warehouses proposed raise over-building concerns. Combined with the acres of wetlands to be filled, the loss of flood control and other environmental services that wetlands provide, and the negative impacts to rural and Areas of Significant Natural Resources, ORK is not convinced that this is the best long-term use of the property. As such, ORK calls all decision makers to seek more information about this development and to carefully consider the long term impacts before permitting any development activities.

1. Weighing Uncertain Warehouse Needs against Natural Resources Impact

ORK is concerned about the rapid and sustained build-out of warehouses in the region. The Hill-Durrence Tract will add 2.3 million square feet of warehouse space and around 75 acres of new impervious surfaces. This is in addition to the 8.3 million square feet of warehouse space already considered by the Coastal Regional Commission and Georgia Department of Community Affairs in just the last six months<sup>1</sup> as well as the 25.6 million square feet currently under

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<sup>1</sup> These projects include DRI# 3966, # 3949, # 3945, # 3930, # 3911, # 3885, # 3980, and # 3981.

construction.<sup>2</sup> ORK urges local, regional, and state decision makers to take a big-picture view of the planned warehouse space.

With such a rapid build-out of warehouse space, ORK is concerned that these spaces might never be used for their intended purposes. Recent numbers from the Georgia Port Authority note that cargo volume is dropping as compared to previous years.<sup>3</sup> In light of slowing traffic, the incoming glut of warehouse space might result in an overbuild of the required need, leading to empty buildings and hundreds of acres of new and unused impervious surface potentially being left abandoned. ORK calls on the local, regional, and state decision makers to take a hard look at the need for any newly proposed warehouse space. Without actual demand, the negative impacts these warehouses could far outweigh their benefit.

It is important to remember that this development is not impacting vacant lands. Large portions of the proposed project are sited in an Area of Significant Natural Resources, including 28.74 acres of wetlands. Once this project is constructed, these areas and the environmental services that they provide - stormwater management and filtration, wildlife habitat, and groundwater recharge, among others - will be lost and will need to be addressed through new or expanded infrastructure, artificial structures, or other forms of mitigation.

Likewise, the proposed uses go against previously-planned land uses for area and adjacent properties. The Future Development Regional Map included in the DRI announcement shows that large portions of the property were designated as “rural” rather than “developing.” These forward-looking designations should not be cast-aside when considering new developments. Doing so risks invalidating the careful consideration taken by local and regional planners after receiving comment, feedback, and input from the residents who would be impacted by this change of course. ORK calls on the decision makers to take past planning decisions seriously when assessing proposed developments.

Overall, ORK urges careful consideration of the actual needs for and benefits from the proposed development compared to the regional impacts that come from their construction. All decision makers should take a hard look at these and all future warehouse developments and compare their long term benefits to the long lasting effects of losing these quickly dwindling significant natural resources and the environmental services they provide.

## 2. Non-Jurisdiction Wetlands’ Benefits and Need for Jurisdictional Determination

Attention should be paid to all wetlands impacted by this proposed rezoning and development, including non-jurisdictional wetlands. While the non-jurisdictional wetlands do not receive the same protection under the Clean Water Act, the services they provide are still important. They help to slow down stormwaters, reducing erosion and sedimentation as well as strain on existing stormwater infrastructure. The slowed stormwaters are also better able to infiltrate and recharge groundwater in these wetlands. Additionally, by retaining excess water, wetlands help reduce the potential for flooding that would otherwise damage adjacent and downstream properties. Finally, wetlands also

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<sup>2</sup> Metro Atlanta CEO. May 3, 2023. “Atlanta, Savannah Among North America’s Top Big-Box Warehouse Growth Markets” Available at: <http://metroatlantaceo.com/features/2023/05/atlanta-savannah-among-north-americas-top-big-box-warehouse-growth-markets/>

<sup>3</sup> Savannah Morning News. April 10, 2023. “Georgia Ports see cargo slowdown, but don't ring the alarm just yet” Available at: <https://www.savannahnow.com/story/business/economy/2023/04/10/georgia-ports-cargo-slowdown-updates-on-brunswick-port-b-erth-expansion/70084397007/>

provide quickly dwindling habitat for the region's wildlife in a rapidly developing area. The jurisdictional status of these wetlands does not reduce their important role.

In light of the recent Supreme Court decision, local and regional elected officials will play a much larger role in determining the extent of wetland protection or destruction in the coming years and decades. Many of Georgia's wetlands are likely to lose federal Clean Water Act protections and the accompanying systematic review by the U.S. Army Corps of Engineers' ("USACE"). Without this oversight, localities, municipalities, and counties will have to take on this responsibility to assess and protect the region's vulnerable and quickly dwindling wetlands. In light of increasing storm and flooding intensity and frequency, rising sea levels, poor groundwater supply, and a growing population, the environmental services that all these wetlands play is invaluable. Filling these wetlands will require expensive, artificial replacement of these environmental services that they are currently providing free of charge. ORK strongly urges all decision makers to take the question of wetland protection seriously both here and in all future proposals.

Additionally, it is unclear whether the wetlands that will be impacted by this development have been assessed by the USACE. As noted above, jurisdictional wetlands receive protection under the Clean Water Act and require additional considerations. Until this jurisdictional determination is made on the more than 28 acres of wetlands proposed to be filled, ORK urges against making any decision approving the proposed conceptual plans.

### 3. Stormwater Considerations from Development

The proposed development will increase stormwater-related pressures on the surrounding areas. Beyond the environmental services lost to wetland fills, the estimated 75 acres of new impervious surface proposed for the development will contribute to additional issues including erosion, sedimentation, and pollution control as well as reduce groundwater recharge. The filled wetlands and increased impervious surfaces also risk increasing the frequency and intensity of flooding in the area, harming surrounding structures, properties, and property values. Without more information about the planned stormwater management, ORK urges all subsequent decision makers to ensure that stormwater will properly and effectively managed and will not contribute to land, groundwater, or water quality degradation.

### 4. Water Supply Demand

The DRI announcement notes that the development plans to meet both its water supply and wastewater disposal through City of Savannah service. ORK supports this approach, especially for wastewater disposal. Centralized water supply and wastewater disposal ensures that waterways and the region's natural resources are better protected.

However, ORK highlights the increased demand on water supply that this project will bring. With saltwater intrusion into the Upper Floridan Aquifer already impacting water supplies for Savannah, Chatham County, and much of the Georgia Coastal Region, the amount of currently permitted groundwater withdrawals is scheduled to be reduced in the near-term. With population continuing to grow, demand on water supply is continuing to grow and stretch existing supplies. ORK calls for careful consideration of this and all new requests that increase demand on local and regional water supply. In addition, ORK calls on local, regional, and state planners to actively consider and plan for

meeting the continually increasing demand for water supply, and to proactively include the public and stakeholders in these conversations, sooner rather than later.

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

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