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

August 28, 2023

Via E-Mail

Commander, U.S. Army Corps of Engineers, Savannah District
ATTN: Shawn Gill, Project Manager, Coastal Branch
100 West Oglethorpe Avenue
Savannah, Georgia 31401
shawn.r.gill@usace.army.mil

Re: Comments on Permit Application Number SAS-2023-00561 - Desnoyers Industrial Park

Dear Mr. Gill,

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 its water quality and aquatic environments.

The proposed Desnoyers Industrial Park development near Bloomingdale in Chatham County raises public interest concerns regarding wetlands, fish and wildlife values, flood hazards, recreation, water supply conservation, land use and property ownership, and general conservation and environmental concerns that ORK wants to bring to the U.S. Army of Corps of Engineers' (USACE) attention.

1. Wetlands Filled - According to the USACE, the proposed fill of 20.65 acres of non-tidal wetlands and 1.1 acres of open water continues a harmful trend of fill in the area. The developers note, however, that up to 23.45 acres of wetlands will be impacted.¹ Since 2020, the USACE has permitted 829 acres of wetlands to be filled in Bryan, Effingham, and Chatham Counties for new warehouse developments. Comparing this total to the three-year period from 2012-2015 following the previous Georgia Port Authority expansion, where only 173 acres of wetland were filled, the recent wetland fill has seen a 479% increase. The proposed Desnoyers development will fill additional wetlands and should be considered in the larger trend of fill activity. Especially considering

¹ See Appendix E - "On-site Configuration."

the speculative nature of recent warehouse construction and the recent decline in cargo traffic,² ORK opposes filling these additional 21 acres of wetlands and open water.

2. Stormwater Impacts from Wetland Fill - By filling these wetlands, the proposed Desnoyers development will increase stormwater-related pressures on the surrounding areas. Wetlands play an important role in slowing down and assimilating stormwater, reducing pressure and stress on existing stormwater infrastructure and reducing flooding and potential property damage. While filling these wetlands alone will increase stormwater flows, the accompanying impervious surfaces of the warehouses and associated parking lots and roads will further increase demand and stress on stormwater infrastructure. As storm frequency and intensity is expected to increase in the coming years and decades, stormwater management will be a continuing problem. The likelihood of property-damaging flooding will increase even without the loss of hundreds of acres of wetlands. These issues are only worse with fewer wetlands. Lost wetlands coupled with insufficient stormwater management infrastructure will lead to increased flooding, more property damage, and the loss of land use potential. These concerns harm the public interest and must be weighed against the speculative benefits of the project.
3. Environmental, Conservation, and Wildlife Impacts from Wetland Fill - Beyond the stormwater processing, flood control, and property protection they provide, wetlands play a variety of important ecological roles. Wetlands play an important role in aquifer recharge, which is of significant concern in this area of concern for the Upper Floridan Aquifer. The loss of the pollution and sediment filtration they provide will harm water quality in nearby water bodies like including the Ogeechee River. Fish, amphibians, and aquatic invertebrates will be harmed not just by this reduced water quality, but also by the loss of wetlands habitat. The harm to the aquatic ecosystem extends as well to the terrestrial wildlife that rely on these species as well. Further, reduced water quality and harm to the fish and game animals reduces the potential for recreation in the surrounding areas. Finally, the loss of green space reduces the environmental health of the area. These concerns all negatively affect the public interest.

The proposed Desnoyers Industrial Park development and its accompanying wetland fill raises serious public interest concerns. These harms to the public interest do not outweigh the speculative benefit of building 864,000 square feet of warehouse space. ORK urges the USACE to deny this Clean Water Act Section 404 permit in order to preserve these quickly disappearing wetlands, to protect the stormwater, and to conserve the fish, wildlife, habitat, and recreation opportunities that these wetlands support and provide.

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

² Savannah Morning News. April 10, 2023. "Georgia Portssee 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-birth-expansion/70084397007/>