



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

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

November 1, 2023

Via E-Mail

Simon Hardt, Senior Regional Planner
Coastal Regional Commission of Georgia
shardt@crc.ga.gov

Re: Comments on DRIs # 4091 - New Hampstead PUD Amendment

Dear Mr. Hardts:

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.

ORK provides these comments on the New Hampstead Planned Unit Development (PUD) amendment. First, greenspaces and wetlands should be preserved as much as possible in order to protect the stormwater, flood control, and other environmental services they provide. Second, the Metropolitan Planning Commission should take this opportunity to revisit the original PUD agreement and require all new development standards that have been passed in the intervening 15 years be met. Third, ORK asks that more complete plans be provided so that the public can fully and constructively comment on this development process.

First, any changes to the New Hampstead PUD's design and layout should prioritize preserving greenspaces and wetlands. These resources are disappearing in a rapidly developing Chatham County, taking with them natural stormwater and flood control services, habitat for wildlife, and the more rural character that residents have enjoyed. As development continues, these issues will continue to compound and negatively affect the human and natural environment. Combined with increasing storm frequency and intensity, stormwater and flood control threatens property damage and the water quality of local water bodies. ORK draws specific attention to wetlands and the crucial water management role they play. Whether 'jurisdictional' or 'non-jurisdictional,' wetlands slow down stormwater, hold and disperse high volumes of water, filter sediment and pollution, and assist in groundwater and aquifer recharge. Throughout the constantly changing wetlands regulatory landscape that will likely continue for decades to come, it is

vital to remember that all wetlands provide important flood and pollution control regardless of their regulatory status. As such, ORK asks that wetlands and greenspaces both be prioritized, preserved, and protected.

Second, amending this PUD agreement provides a rare opportunity for local decision makers to better protect and enhance the greenspaces, water resources, and quality of life for residents. Since the original PUD agreement was in 2007, both the region and the immediate surrounding of the New Hampstead PUD have undergone significant changes. Likewise, new and updated local and county ordinances impacting developments have likely also occurred in the intervening decade and a half. With the developers seeking to change the terms of the original agreement, any requirements that apply to new developments should also be applied to New Hampstead. At minimum, the areas where design or density changes are to take place should be held to the same standards as other concurrent developments. And where possible, other areas of the PUD should also be brought into compliance with current expectations. With the opportunity that the developer's desired departure from its original agreement provides, ORK urges local decision makers to bring the PUD up to date with current standards for the betterment of the area's residents, waters, and lands.

Third and finally, ORK asks for clearer and more complete information about the amendments being sought. The only site-specific information shared with the public in this DRI Public Notice is in the "Amended Land Use Plan" (also called the "Conceptual Plan"). While this provides a general layout, the plan does not provide very much information about how development within these areas will be undertaken. No general structure footprints, stormwater management, roads, or any other information is provided. Likewise, the PUD agreement itself is not included in the announcement. Providing these kinds of important information is important in eliciting constructive, informed, and useful feedback from impacted communities, stakeholders, and the broader public. ORK asks that this information be shared with the public and an opportunity for comment be provided. ORK also asks that this information be provided in future DRI Public Notices.

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