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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 # 4085 - Port Royal PUD

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 proposed Port Royal Planned Unit Development (PUD) to be located on Port Royal Road in Bryan County and developed by Hoyer Investment Company. As a newly proposed PUD, ORK urges Richmond Hill, Bryan County, and the State of Georgia to take a long-term view of the project. In a rapidly developing landscape, untouched natural spaces are quickly disappearing, while wetlands continue to be filled. As storm frequency and intensity both rise, the loss of these irreplaceable natural resources threatens to harm water quality and local communities by increasing the risk of flooding, sedimentation, and pollution. ORK urges local and state decisionmakers to protect these communities and water resources by preserving greenspaces and wetlands.

First, natural spaces should be preserved as much as possible. Maintaining these quickly disappearing spaces helps to preserve the natural and cultural values of southern Bryan County. Losing these spaces threatens to displace wildlife, potentially creating conflicts throughout Richmond Hill and Bryan County. Likewise, these natural spaces provide recreational opportunities, aesthetic value, and other difficult to quality environmental benefits like improved air quality, erosion reduction, and improved water quality. Once these resources are lost, they are gone. Remediation will take generations and will provide a fraction of the benefit that the naturally adapted spaces provide. Instead, ORK strongly urges local decision makers to maintain currently-existing greenspaces.

Second, wetlands should receive specific attention and careful consideration in the permitting and development process for the stormwater management and water quality services they provide. It is important to state that all wetlands - both jurisdictional and non-jurisdictional - provide important services. With the constantly changing wetlands regulatory landscape that will occur during the development of this PUD, it is vital to remember that wetlands provide important flood and pollution control regardless of their regulatory status. All throughout northern Coastal Georgia, hundreds of acres of wetlands have been filled and irreparably lost over the last decade. These losses threaten to increase damaging flooding, degrade local waterways, and require expensive responses from local and state governments as well as landowners. To preserve natural resources and reduce the costs borne by either local governments or local landowners, wetland preservation should be prioritized and sought wherever possible.

Prior to rezoning this property for PUD use, ORK urges decisionmakers to emphasize and protect all wetlands. This will help to ensure that existing land uses are protected, a desirable and stable environment is maintained for generations to come, and that water resources are protected. The documents included in the DRI do not clearly show the location and potential impacts to existing wetlands. While the Conceptual Plan shows jurisdictional wetlands post-development, it does not show whether wetlands will be filled. The status of wetlands is further clouded by the statement in the "Environmental Quality" section, where the applicant states that "all wetlands will be impacted" but then states that impacts will be limited to less than 0.5 acres. As the ARSA map shows that nearly the entirety of the property is designated as an Area of Significant Natural Resources, it is important to know the full extent of wetlands' presence when making permitting and rezoning decisions. ORK urges decision makers to be extremely cautious when considering activities that will fill wetlands.

Third and finally, ORK urges decisionmakers and the developers to meet its wastewater needs through interconnection into a centralized sewer system rather than through onsite wastewater treatment or septic systems. Both individual and community septic systems place additional pressure on nearby lands and waters more than sewer interconnection. Especially in low-lying areas like Richmond Hill and southern Bryan County, the effectiveness of septic systems is reduced, with nearby waterways vulnerable to increased bacterial pollution. More frequent storms and flooding exacerbate these concerns. With portions of the property located in the 100-year flood plain, this risk is even higher. Finally, the infinite lifetime and regular monitoring and maintenance of septic systems creates the risk of future contamination that will fall on future generations of Bryan County residents and leaders. Overall, sewer interconnection is the preferable long-term option for wastewater disposal.

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