



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

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

February 13, 2024

Via E-Mail

Commander, U.S. Army Corps of Engineers, Savannah District
100 West Oglethorpe Avenue
Savannah, Georgia 31401
ATTN: Mrs. Sarah Wise
Lead Biologist, Coastal Branch
sarah.e.wise@usace.army.mil

**Re: Savannah Harbor - Interstate 16 Corridor Joint Development Authority's Permit Modification Request -
Permit No.: SAS-2015-00235**

Dear Mrs. Wise,

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 21 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. 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 offers these general comments on the importance of maintaining and preserving wetlands for Coastal Georgian communities in a rapidly industrializing landscape. Wetlands offer important stormwater control while also playing a crucial role in providing aquatic habitat and improving water quality. The intensity of development in the area emphasizes the need for protection and localized mitigation efforts. ORK urges the U.S. Army Corps of Engineering to carefully consider the environmental services and ecological functions that these quickly dwindling resources provide prior to permitting the additional wetland fill requested here.

Fill and impacts to wetlands should be minimized at every opportunity. Wetlands provide a wide range of environmental services that benefit the region's residents, including flood control, pollution filtration, aquifer recharge, and recreation in addition to providing habitat and forage for a variety of species. As the region continues to develop and more impervious surfaces are placed on the landscape, stormwater management will become more important.

Combined with the increasing frequency and intensity of storms, protecting the environmental services that wetlands are already providing is essential for the region's long-term resiliency.

Short of rejecting wetland filling, mitigation efforts should be focused in the areas immediately impacted by any expanded fill. With the rapid rate of wetland destruction in the area around this project, local impacts will continue to accumulate. Rather than solely requiring mitigation credits to address impacts, ORK urges the U.S. Army Corps to require permittees to undertake wetlands restoration projects in the areas immediately around the lands and waters that are currently supported by the wetlands that are proposed to be filled here. These local restoration projects will benefit the areas directly impacted by expanded wetland fill.

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