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

September 21, 2026

Via E-Mail

Commander, U.S. Army Corps of Engineers, Savannah District
ATTN: William Rutlin
4751 Best Road, Suite 140,
College Park, Georgia 30337
william.m.rutlin@usace.army.mil

Re: E. 60th Street and Uruguay Street (Truman Parkway Tract) - Permit No.: SAS-1999-05580

Dear Mr. Rutlin,

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 land development projects throughout the watershed that could pose a significant threat to its water quality and aquatic environments.

ORK offers these comments on the application from Mr. Matthew Willis (Resource & Land Consultants) on behalf of Mr. Jakob von Trapp (1800 East 63rd Property Owner, LLC) under Clean Water Act (CWA) Section 404 for the construction of multi-family residential housing located at 1800 East 63rd Street in the city of Savannah, Chatham County, Georgia (Latitude 32.031201, Longitude -81.082726). Hereinafter, the project will be referred to as the "Truman Parkway Tract project."

Our comments address two overarching concerns. First, the alternatives analysis must thoroughly consider both other locations and different layouts that could wholly avoid any wetlands filling and other negative impacts from the proposed project. Second, the cumulative impacts of the proposed project appear to weigh against authorizing this project. ORK urges the U.S. Army Corps of Engineers (USACE) to deny this requested permit unless it is certain that these concerns are fully addressed.

1. Alternatives to the proposed activities do not appear sufficient

Alternative to the proposed action must be considered in reviewing this permit modification application. Before any permitting decision to fill wetlands, it must be conclusively determined that there are no practicable alternatives that are less damaging that would achieve the same purpose of the proposed action. This should include alternative site layouts as well as alternate properties and a "no action" alternative. Unless the USACE considers all of these alternative scenarios and concludes the proposed action is the least environmentally damaging practicable alternative, it should not approve this requested permit.

The proposal appears to overlook less environmentally damaging alternative site layouts. The proposed layout utilizes none of the upland, non-wetland portion of the property - the entirety of the proposed construction occurs in wetlands. This, on its face, suggests that some alternative layouts that utilizes upland areas exist. These alternative layouts would likely further reduce wetland impacts and be less environmentally damaging.

Additionally, an alternative with smaller construction footprints could further reduce wetland impact. This could be achieved in two ways. First, a smaller number of units could shrink the overall footprint of the building and reduce the need for parking areas. Nowhere in the Public Notice identifies a specific number of units needed, just that its goal is to "provide housing" "to serve the needs of the medical community of Candler and Memorial hospitals." This suggests that a smaller number of new housing units, potentially zero new units, are required to meet the need. Second, an alternative layout that build vertically could further reduce wetland impacts. Having a smaller building footprint would necessarily reduce the acreage of wetlands impacted. As such, a taller construction should be considered as a less environmentally damaging alternative. ORK urges the USACE and the applicants to consider approving an alternative layout that includes either a smaller number of housing units or a taller construction with a smaller footprint.

It does not appear that alternative properties were considered as alternatives. No detailed discussion of other nearby properties was included in the "Avoidance and Mitigation" discussion of the Public Notice, beyond merely stating that the applicant "considered" offsite locations. ORK urges the USACE to more thoroughly consider offsite alternatives, as numerous properties without wetlands exist in the area.

Finally, the Public Notice makes no mention of considering a "no action" alternative. As noted above, neither the applicant nor the Public Notice provides any specific metric for the purpose or need for housing. Considering that the facilities are currently operating, the medical community is, theoretically, already being served by the current supply of housing. Without specific metrics of need, the supposed purpose of the project is theoretical and, therefore, should not outweigh the environmental damage caused by wetland filling.

Before approving the filling of these wetlands as requested, the USACE should be able to answer:

- Is there an alternative site layout that would reduce the acreage of wetlands to be filled?
- Is there an alternative layout that could utilize the upland areas of the property?

- Do the application claim that there are specific numbers of housing units it must build? Is this based on any fact-based needs analysis?
- Could a smaller number of housing units be built to meet the suggested purpose of the project while reducing wetland impacts?
- Could a taller, more compact construction achieve the same purposes while impacting fewer acres of wetlands?
- Is the USACE convinced that alternative properties exist that could achieve the purpose of the project that require fewer or no wetland impacts?
- Was a no-action alternative considered? Could the purpose of housing still be achieved if the proposed action is not approved? Are there any fact-based metrics of the supposed need?

2. The public interest review factors do not weigh in favor of approving this project's permit

Any benefits reasonably expected from this proposed project are likely outweighed by the reasonable foreseeable detriments when considering the public review factors. *See* 33 CFR § 320.4. The cumulative effects are not overcome by the suggested medical-related housing. As such, ORK urges the USACE to deny this permit as not in the public interest.

In terms of economics, this project does not clearly benefit the public. As stated above, there is no fact-based justification for the need for "multifamily residential housing…to serve the needs of the medical community of Candler and Memorial hospitals." No specific numbers, studies, or analysis was provided in the Public Notice. As suggested by both facilities currently operating, the medical community appears to be meeting these needs elsewhere. Without a fact-based need, the economic value of this proposed project is not clear.

When considering the continued degradation and destruction of the region's environment, the detriments to the public interest are made clearer. The 800+ acres of wetland destruction in just the last five years makes these aquatic resources a rapidly disappearing resource. The habitat function, pollution filtration, groundwater recharge, and stormwater control role, as well as other environmental functions that wetlands play, continue to disappear. This continued devaluation of wetlands will continue unabated if the USACE does not take an active role in wetlands management. A wetlands protection plan is necessary. The environmental detriment of both the expansion and the original project is not in the public interest.

Further, floodplain management will be negatively impacted by this proposed project. The entirety of the property is located within the Zone AE Special Flood Hazard Area as designated by the Federal Emergency Management Agency (FEMA).[1] Not only will this negatively impact the natural moderation of flooding, it will expose the future residents to increased flood risks. The continued loss of wetlands, ultimately, reduces the safety of the area and the wider region. Wetlands provide important, natural, and free stormwater and flood control functions. These aquatic resources slow down and absorb stormwaters. Paving over these resources not only removes this control and absorption, the impervious surfaces speed up stormwater and exacerbate flooding if left unmitigated. This increased

[1] *See* Attachment A.

flood risk, in an already flood-prone area, threatens the area's safety and property values - clearly a detriment to the public interest.

Before approving the filling of these wetlands as requested, the USACE should be able to answer:

- Is there a fact-based economic benefit to the proposed project?
- Does any economic benefit outweigh the cumulative impacts from:
    - The continued degradation and destruction of the region's environment,
    - The loss of natural moderation of flooding, and
    - The increased flood risks of future residents?

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

Attachment A

Georgia Department of Natural Resources
Flood Map - Flood Risk Viewer
for the
E. 60th Street and Uruguay Street (Truman Parkway Tract) development


GEORGIA Georgia Flood MAP - Flood Risk Viewer version 2.0
Find address or place
Lexington Ave
Hospital Access Rd
Harry Truman Pkwy
Uruguay St
E 59th St
E 60th St
Costa Rica St
Springhill Rd
E 62nd St
E 63rd St
Reuben Clark Dr
Metts Dr
CHATHAM COUNTY
13051C0162G
8/16/2018
PRELIMINARY
CHATHAM COUNTY
13051C0164G
8/16/2018
PRELIMINARY
ZONE AE
13
200ft
Microsoft, Vantor | Esri, HERE, Garmin, iPC | Esri, HERE, iPC
POWERED BY esri