

SOUTHERN ENVIRONMENTAL LAW CENTER

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November 25, 2015

Coastal Regional Commission of Georgia
Attn: Bill Compton
1181 Coastal Drive SW
Darien, GA 31305

Re: Development of Regional Impact #2524 – Port of St. Marys Industrial & Logistics Center

Dear Mr. Compton:

On behalf of the Satilla Riverkeeper (SRK) and St. Marys EarthKeepers, Inc., the Southern Environmental Law Center submits the following comments on the Development of Regional Impact (DRI) #2524 for the Port of St. Marys Industrial & Logistics Center. The developer, Port of St. Marys, LLC, requests a rezoning of approximately 722 acres of the former Durango Mill Site located within the City of St. Marys from Planned Development Mixed Use to Planned Development Industrial in order to support industrial and commercial land uses on the property. The stated purpose of the request is to allow for the development of manufacturing, port logistics, and marine facilities on the property.

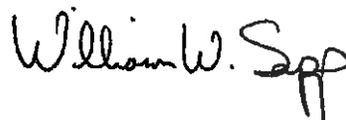
The port facility is proposed to be constructed in close proximity to state marshlands, the North River, and the St. Marys River. SRK and St. Marys EarthKeepers are concerned with the potential environmental impacts of the proposed facility and urge the Coastal Regional Commission to address the following issues in the DRI Report and the City of St. Marys to consider the following issues before approving any proposed rezoning for the area.

- 1) Wetlands and salt marsh:** SRK and St. Marys EarthKeepers are concerned with the project's location with respect to freshwater wetlands and salt marsh. The total property under review includes 165 acres of salt marsh. The property also includes U.S. Army Corps of Engineers jurisdictional freshwater wetlands. Both the Commission and the City of St. Marys should consider the environmental impacts that the facility and its construction will have on surrounding salt marsh and freshwater wetlands.
- 2) Wood stork habitat:** SRK and St. Marys EarthKeepers are concerned about the wood stork colony that has been identified on the property proposed for redevelopment. This colony has been documented nesting within a borrow pit on the property. The wood stork is listed as a threatened species under the Endangered Species Act by the U.S. Fish and Wildlife Service. The Commission and the City of St. Marys should consider the impact this development and its construction will have on wood stork habitat on the property and the health of the wood stork colony.

- 3) **Increased impervious surface:** SRK and St. Marys EarthKeepers are concerned about an increase in impervious surfaces in the area and the manner in which additional stormwater will be treated. Once the proposed development is complete, 75 percent of the site is projected to be impervious surface. The applicant states that the project will utilize on-site stormwater detention ponds and buffers. It is important to determine whether those ponds would retain all stormwater from the development or if additional stormwater will be added to the stormwater system. Additionally, the Commission and the City of St. Marys should inquire whether the ponds will be discharging stormwater into the adjacent marsh. Any discharges into the surrounding marshlands could negatively impact an environmentally sensitive area.
- 4) **Traffic and noise:** SRK and St. Marys EarthKeepers are concerned about an increase in traffic and noise from additional truck and train traffic, should this site be rezoned and industrially developed as a manufacturing and port facility. The Commission and the City of St. Marys should consider the impact that a 722-acre industrial area will have on the surrounding communities, in terms of increased truck traffic and noise.

Thank you for your consideration of these comments. Should you have any questions, please contact one or both of us at (404) 521-9900, or by email at bsapp@selcga.org and hbarnes@selcga.org.

Sincerely,



Bill Sapp
Senior Attorney



Helen Barnes
Associate Attorney