



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

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

May 12, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4698 - Hicks Tract - Suncap Warehouse - Pooler

Coastal Regional Commission and the City of Pooler:

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 20 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 in the watershed that could pose a threat to its water quality and aquatic environments.

ORK's comments on the Hicks Tract - Suncap Warehouse development fall into two main categories. First, ORK is unconvinced about the actual need for this project, as millions of square feet of warehouse space is currently vacant. Second, this Site Development Plan presents serious concerns about stormwater and flooding, wetland filling, and construction within the floodplain, with harms occurring on both the development site and neighboring properties.

Additionally, ORK wishes to share our concern with the number of DRIs that have been announced in quick succession and alert the City of Pooler and the Coastal Region Commission (CRC) of the difficulty that creates in collecting thoughtful and constructive public feedback. In the future, ORK asks that DRIs be submitted and shared as they are applied-for, not all at once, as happened here. ORK encourages deadline extensions and leniency when needed for comment collection, and urges a careful, methodical, and inclusive approach in the decision-making process.

1. No demonstrable need for additional warehouse space

Warehouse space is not lacking in the Savannah region. In fact, the opposite is true - the Savannah warehouse market has a **roughly 10% vacancy rate**.¹ With a clear lack of need for the proposed use, ORK urges the City of Pooler to take steps to reject this project's Site Development Plan.

The Savannah regional market does not have a demonstrable need for new warehousing and logistics developments. Warehouse development continues at an unprecedented rate, leading to an ever-growing oversupply of space. Looking specifically at the Savannah-area warehousing market, vacancy rates have continued to rise over the previous year. The vacancy rate remains extremely elevated from the recent low seen in 2022 Q4's vacancy rate of less than 1%. **Between 2022 and 2024**, the Savannah market has **added more than 50 million square feet**² of warehouse space - **a nearly 50% increase** in supply over an incredibly short period. In the **last 5 quarters**, another **~18 million square feet**³ of new space has been added. Based on the averages of vacant rate applied to total inventory,⁴ **there is currently around 18 million square feet of already-existing and vacant warehouse and distribution space**.

With between 3.8 million and 5 million square feet of additional space currently under construction⁵ and likely tens of millions more square feet rezoned and approved but not yet under construction,⁶ this trend appears to have no end in sight. **Simply put, there is no clear need for more new warehouse space.**

¹ **Average Q1 2026 vacancy rate = 10.83%**

Lee & Associates = 12.8%

(https://www.lee-associates.com/atlanta/wp-content/uploads/sites/77/2026/04/Savannah-Industrial-Market-Report_2026_Q1.pdf)

Colliers = 9.8%

(<https://www.colliers.com/download-article?itemId=ae147393-d90e-4aae-a3c8-562292fe5aad>)

Cushman & Wakefield = 9.9%

(https://assets.cushmanwakefield.com/-/media/cw/marketbeat-pdfs/2026/q1/us-reports/industrial/savannah_americas_alliance_marketbeat_industrial_q12026.pdf?rev=94a98d29b2f14009b0265150f484227)

² Q4 2022 total = 102,993,004 square feet (Q1 2023 total = 103,514,071 [minus] Q1 2023 delivered = 521,067) -

<https://www.colliers.com/en/research/savannah/2023q1industrial>

Q4 2024 total = 153,531,831 square feet (Q3 2024 total = 137,731,831 [plus] Q4 2024 delivered = "15.8 million") -

<https://www.colliers.com/en/research/savannah/2023q1industrial> and

<https://www.colliers.com/en/research/savannah/2024q4industrial>

Two-year net increase = 50,538,827 square feet

³ Per Lee & Associates quarterly reports = **27,491,785 sqft** → 2025 Q4 167,637,487 (minus) 2024 Q4 140,635,189 (plus) 2026 Q1 507,460.

Per Colliers quarterly reports = **18.188M sqft** → 2025 Q1 = 4.9M sqft; 2025 Q2 = 4.2M sqft; 2025 Q3 = 943k sqft; 2025 Q4 = 745k sqft;

2026 Q1 = 7.4M sqft.

Per Cushman & Wakefield quarterly reports = **13,326,380 sqft** → 2025 Q1 = 4,580,464; 2025 Q2 = 4,009,093; 2025 Q3 = 2,453,583; 2025

Q4 = 2,058,600; 2026 Q1 = 224,640.

⁴ **Average = 18,357,204 square feet**

Lee & Associates' vacancy rate of 12.8% applied to the total inventory of (2026 Q1 new supply 507,460 sqft + 2025 Q4 total inventory 167,637,487) put the total vacant square footage at **21,522,553**.

Colliers' 9.8% vacancy rate applied to total inventory of 172,492,470 results in **16,904,262** square feet of vacant space.

Cushman & Wakefield put total vacant square footage at **16,644,799**.

⁵ Lee & Associates = 4.7M sqft; Colliers = 5M sqft; Cushman & Wakefield = 3.8M sqft.

⁶ An example of rezoned, permitted, and unbuilt warehouse space is the Seaport 16 Trade Center development.

See Savannah Morning News. "Industrial Park in Bryan County empty nearly two years after groundbreaking." May 30, 2024. See:

<https://www.savannahnow.com/story/news/2024/05/30/seaport-16-trade-center-in-north-bryan-has-not-gone-vertical-yet/73773238007/>

In sum:

- There is no clear need for new warehouse space.
- The warehouse vacancy rate remains around 10%.
- Roughly 18 million square feet of warehouse space is entirely empty and ready to be utilized.
- More speculative warehouse space will only add to the glut of supply, at the cost of other land uses.

2. Stormwater management should build in long-term resilience, including wetland preservation

Stormwater management is important for any development in Chatham County. As storms will intensify and occur more frequently in the coming years and decades, stormwater management will only become more important. As such, preservation of natural stormwater management, reduction to artificial and constructed stormwater intensifiers, building in long-term resilience, and avoiding construction in hazardous areas should be conditions that the City of Pooler imposes on the applicant and developers .

Stormwater management planning as reflected in the DRI notice and associated materials are inadequate. The applicant only states that “A stormwater management pond is proposed to mitigate the impacts of stormwater management.”⁷ Beyond this single sentence, no other plans are shared, not even the size, depth, or dimensions of this proposed stormwater management pond. This is insufficient - the best time to consider flooding and how stormwaters will be managed on the property is now, before any land clearing or grading, wetland filling, or construction begins. Not centering these fundamental considerations now threatens to make them afterthoughts. Proactive planning and concrete proposals should be discussed before any approvals occur.

Wetlands - natural and no-cost stormwater management - should be preserved throughout the property. These quickly-dwindling resources not only reduce stormwater flows, they retain important volumes of stormwater, filter pollutants, and provide natural habitats for the region’s fish and wildlife. All of these ecosystem services are invaluable and are freely available - so long as the City of Pooler and other governmental bodies and regulators do not allow developers to fill the wetlands and build atop them. When wetlands are filled, these services are lost and either have to be replaced with expensive and less effective artificial options or are not replaced and harm our shared places and natural resources. **Wetlands provide these ecosystem services regardless of the Army Corps’ jurisdictional determination.** As such wetlands preservation should be the first step in stormwater management.

Further, the City of Pooler should seek clarification from the applicant on the question of wetlands impact by requiring the applicants to develop and publish a separate wetlands plan. Failing to delineate and enumerate the wetlands present on the site obscures the actual impact that this development will have on the property’s existing aquatic features. Failure to include wetland location on the Master Plan shows the applicant’s lack of sufficient consideration of these wetlands in their planning. To address this apparent oversight, ORK asks the City of Pooler to require the applicant to create a wetlands plan that, at minimum, (1) clearly delineates all of the wetlands present on the property, overlays their location on the Master Plan and any subsequent plans, and enumerates the acreage

⁷ DCA. “DRI #4698 DEVELOPMENT OF REGIONAL IMPACT DRI Information Form Part 2” Available at: <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4698>

proposed to be filled and preserved, (2) prioritizes and details how the development preserves the wetlands present on the site, (3) adjusts the Master Plan and site layout to avoid wetland fill wherever possible, (4) provides a justification for why wetlands must be filled, and (5) mitigates any lost wetlands and their ecosystem functions with on-site mitigation or restoration efforts as close to the site as possible to reduce localized impacts.

Impervious surface coverage reduction should be the second step in reducing stormwater management pressure. Based on the applicant's estimate of 68% impervious surface coverage of the approximately 64.71-acre site, this proposal will create approximately **44 acres of new impervious surface**. These hard surfaces, like concrete and asphalt, prevent stormwater from infiltrating into the ground, where they can be absorbed and reduce stormwater volumes. Impervious surfaces also speed up stormwaters, adding to management pressure. Finally, impervious surfaces hold pollutants and allow them to be washed into nearby waterways if not properly captured or treated. To reduce these issues, a significant reduction in impervious surfaces should be prioritized.

Following wetland preservation and impervious surface reductions, the developers should be required to build resilient and long-term stormwater retention/detention structures. The City of Pooler should be specific in its requirements, rather than relying on non-specific, passing references of potential management options. To better prepare for intensifying and more frequent storming and flooding, stormwater and flood damage prevention designs should go beyond the required minimums. First, the development should be conditioned on **reducing post-construction runoff**, rather than just ensuring no additional runoff compared to pre-construction amounts. This will help to offset stormwater pressure from stronger storms. Second, **increasing stormwater retention/detention ponds capacity** should be increased. As one of the main mechanisms to control post-construction runoff, these ponds capacities are important. In anticipation of increasing storm strength, requiring these ponds to be able to retain and assimilate 125% of the 100-year storm or 100% of the 500-year storm.

Finally, the **flood risks and accompanying flood damage** should not be ignored. While this site is not within a currently designated FEMA flood zone, this does not absolve the site from flooding risks. The greater Savannah region has seen increases in flooding even in non-designated floodplains, with a recent example being the devastating flooding in Richmond Hill in 2024.⁸ Increasingly frequent and intense storms coupled with aging maps - the floodplain maps for this site were last updated in 2018 - make potential flood risks nearly anywhere in the region. As such, robust stormwater management is necessary for any new development. As such, ORK strongly urges the City of Pooler to seriously consider flood risk when deciding whether to approve the proposed Site Development Plan.

Likewise, the City of Pooler should also take into account the potential financial burdens related to flooding. Those financial burdens include, but are not necessarily limited to property and structure damage, water and land pollution, and buyout costs. At the most basic level, flooding threatens to inundate, damage, and destroy any structure in its path. Structures within the floodplain see their risks increase. Costs of clean up, collateral damage, and to neighboring properties should be considered. Flooding also presents water pollution threats. As discussed above, gasoline and diesel fuels as well as other remnant vehicle-related pollution from frequent car and truck traffic risks

⁸ Savannah Morning News. "FEMA flood maps left Richmond Hill residents unprepared for Debby's impact." August 26, 2024.

Available at:

<https://www.savannahnow.com/story/news/environment/2024/08/26/debby-flooding-hit-unprepared-richmond-hill-residents-hardest/74921847007/>

being swept up in flood waters. The nearby Little Ogeechee River is the principal water body threatened by these pollution risks. Finally, if flooding occurs frequently enough, FEMA may offer a property buyout⁹ to return the property to its now-current, undeveloped conditions. These buyouts, though funded mainly by FEMA, still expect a 25% contribution from the local and/or state government.¹⁰ This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs would likely fall on the City. ORK urges the City of Pooler to specifically consider and factor in these foreseeable financial costs of building in the floodplain.

In summary:

- Stormwater management considerations must be central to any land use decision made by the City of Pooler,
- The current discussion of stormwater management, as reflected in the DRI notice and application materials, is inadequate,
- Wetland preservation should be prioritized for the broad-ranging and free environmental services it provides, and their presence on the site should be fully detailed in Wetlands Plan,
- A reduction to the 72+ acres of new impervious surface coverage should occur,
- Stormwater retention and detention features should be built above minimum standards to add long-term resiliency in light of anticipated increased storm frequency and intensity,
- Flooding risks exist outside of current FEMA maps, and
- Pooler risks the possibility of bearing costs related to FEMA buyouts.

3. Additional suggested conditions for any Site Development Plan approval

ORK reiterates its opposition to the construction of any new warehouse space in light of the roughly 10% vacancy rate, especially at the expense of lost wetlands and increased stormwater pressure. However, if the City of Pooler does decide to approve the Site Development Plan for this project, it should come with as many conditions as necessary to ensure that the project not only prevents any harms to neighboring and nearby properties and amenities, but it should also ensure that the community directly benefits from this project, beyond the mere expansion of the tax base.

To help achieve these dual goals of protection and benefit, ORK suggests the City of Pooler considers adding the following conditions :

- Community Benefits Agreement - requiring a signed agreement between the owner/operator and the relevant neighborhood association or similar local organization to ensure that the impacted community also benefits from the project;

⁹ University of Delaware Disaster Research Center and The Nature Conservancy. "Floodplain Buyouts: Challenges, Practices, and Lessons Learned." At page 9. August 2021. Available at: https://www.nature.org/content/dam/tnc/nature/en/documents/Buyouts_Lessons_Learned_Siders_Gerber_Chavez_TNC_Full_Report_2021.pdf

¹⁰ Federal Emergency Management Agency. "FACT SHEET: Acquisition of Property After a Flood Event." Available at: <https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event>

- Wetlands Plan - a third-party study that (1) clearly delineates all of the wetlands present on the property, overlays their location on the Development Site Plan and any subsequent plans, and enumerates the acreage proposed to be filled and preserved, (2) prioritizes and details how the development preserves the wetlands present on the site, (3) adjusts the Master Plan and site layout to avoid wetland fill wherever possible, (4) provides a justification for why wetlands must be filled, and (5) mitigates any lost wetlands and their ecosystem functions with on-site mitigation or restoration efforts as close to the site as possible to reduce localized impacts;
- Stormwater management - requiring a *reduction* of (not just a prevention of new) post-completion runoff, through a combination of wetlands and pond preservation, pervious pavers, bioswales, stormwater retention/detention ponds with sufficient capacity, and other green infrastructure options that reduce stormwater impacts;
- Floodplain construction prohibition and buffer - construction should be prohibited within a FEMA-designated Special Flood Hazard Area. A 50-foot non-construction buffer should also be placed from the edge of the Special Flood Hazard Area to account for future expansion of the floodplain;
- Alternatives analysis - a detailed explanation of all of the site configurations and plans considered and explanations why the final plans were selected. This should include warehouse/parking lot/road layout, wetlands and pond filling decisions, and road/bridge construction/layout. This should also include a “No Action” alternative that discusses why the services this project will provide cannot be met elsewhere;
- Data center exclusion - an explicit condition that this property cannot be used for data centers, cryptomining, or other data processing without a subsequent conditional use consideration and vote by the Pooler City Council at a Public Hearing;
- Habitation exclusion - an explicit condition that this property cannot be used to house, host, or other provide overnight shelter;
- Noise pollution - limiting hours of operation, instituting decibel limits, sound barriers (vegetative buffers/berms or artificial);
- Light pollution - requiring shading and/or blocking devices that prevent lights from shining onto nearby properties; and
- Solar-ready design - to allow for solar energy generation to be placed on warehouse roofs, preventing the need for more land disturbance, allowing lower cost and renewable energy to reduce power bills, and build-in local electricity resiliency.

4. Need for time, flexibility, and genuine public involvement in DRI decision-making process

In light of the recent glut of DRIs for the City of Pooler, ORK strongly urges caution, patience, and additional public outreach in the coming weeks and months. As such, ORK calls for flexible deadlines on comments, spaced-out and slow-paced decision-making on these projects, and a strong effort from the City of Pooler to educate, inform, and allow for robust public discussion of each of these projects before a final decision is made, above and beyond the usual review process.

In the last month, there have been four¹¹ separate Developments of Regional Impact up for consideration just within the City of Pooler's jurisdiction. Any single one of these developments could have serious, significant, and permanent impacts on neighboring and nearby property owners. Each project requires significant time to meaningfully read, review, understand, and provide considered and constructive feedback on. For working residents, the time needed to review just one project could be prohibitively long. Stacking multiple of these regionally-impactful developments could make meaningful public engagement and feedback nearly impossible. The purpose of the DRI process is to help stakeholders, residents, and governments gain an understanding of the project impacts on a local as well as a regional level before a decision is made. Rushing these important steps or providing incomplete/unclear information in an application weakens the effectiveness of the DRI process.

Spreading out the voting timeline on these DRI projects is one way to lessen the burden on the public. By limiting each City Council meeting to the review and approval of a single DRI project, the public will be able to meaningfully review and provide feedback on these projects. To do otherwise risks excluding residents' feedback with no clear benefit.

In general, ORK urges the CRC and City of Pooler to approach these upcoming projects slowly and ensure public input can be meaningfully included.

Thank you in advance for your time and consideration; please let me know if you have any questions or would like to talk further on these topics: ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper

¹¹ (1) DRI #4693 - The District, (2) DRI #4697 - Oglethorpe Speedway - Stone Property Warehouses, (3) DRI #4698 - Hicks Tract - Suncap Warehouse, and (4) DRI #4701- QuickTrip Gas Station & Convenience Store.