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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

May 21, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4732 - Harmony Subdivision Phase 9 - 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 main concern with the proposed **Harmony Subdivision Phase 9** development plans are related to the wetlands present on the site. ORK strongly encourages the applicant and the City of Pooler to center wetlands preservation in this project's layout, planning, and construction. Wetlands preservation would help to reduce stormwater pressure. When coupled with resilient stormwater management features, the City of Pooler can better protect its future residents.

Wetlands are a valuable and quickly disappearing natural resource. In both the City of Pooler and throughout the region, wetlands are being filled at an alarming rate. Losing these resources contributes to increasing stormwater demand and flood risks, more pollutants entering our shared waterways, and wildlife displacement due to habitat loss, among other ecological services they provided at no cost. Once lost, any future remediation efforts will be expensive and may never restore the resource to its previous condition. ORK asks the City of Pooler to carefully consider these wide-ranging impacts when making its decision on this proposal. First, wetlands should be overlaid on the Concept Plan to easily where wetlands would be filled and how alternative layouts could prevent filling. Second, wetland filling should only be allowed when no alternative exists. Allowing fewer or smaller structures is the simplest alternative to preserve wetlands.

Stormwater management will be aided by preserving wetlands. Wetlands slow down stormwaters, reducing flood damage risks, while also retaining significant volumes, reducing pressure on other management features. Their

presence on this property indicates that stormwaters already tend to flow to and pool in these locations. Placing structures on filled-in wetlands increases their flooding risk. Rather than increasing this risk and replacing these natural resources with more expensive artificial management features. ORK urges the City of Pooler to preserve the wetlands present on this property and throughout the whole city.

It is important to note that wetlands provide these services regardless of their jurisdictional determination. Whether designated as “jurisdictional” or “non-jurisdictional” by the U.S. Army Corps of Engineers, wetlands provide all the ecological services noted above, including stormwater management, and more. The City of Pooler should pay attention to the jurisdictional determination only to see if federal permitting is required and should not assign value based solely on that determination.

Resiliency should be built-in to any new construction. Stormwater management and flood risk reduction will become increasingly important in the coming years and decades. Storm events are anticipated to grow in intensity and occur more frequently. With this, FEMA-designated flood zones are likely to expand into new areas. Considering these expectations, the City of Pooler should require resilient designs for all new projects. Stormwater management ponds should be constructed to retain and assimilate 125% of the 100-year storm or 100% of the 500-year storm. Further, buffers should be extended 100ft from the edge of the current FEMA flood maps to account for future extension of these Special Flood Hazard Areas. Requiring resiliency at this stage of development will ensure that future generations of residents will not be exposed to growing stormwater and flood risks.

In sum:

- Wetlands provide valuable ecological service at no cost - stormwater management, flood control, pollution filtration, and habitat.
- Filling-in wetlands increases stormwater pressure and flood risks.
- Jurisdictional determinations do not assign value, only determining federal permitting requirements.
- New construction should build-in resiliency to better anticipate increasing frequency and intensity of future storms and floods.

ORK asks that:

- Wetlands to be preserved at every opportunity, and should only be filled when no alternatives exist.
- The Concept Plan should have wetlands locations visible, to show where wetlands will be filled and where alternative layouts are possible.
- Stormwater management ponds increase retention capacity to build-in resilience.
- Buffers from the edge of current floodplains are put in place to allow for future extensions.

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