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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

May 4, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #4697 - Oglethorpe Speedway - Stone Property Warehouses

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 Oglethorpe Speedway - Stone Property Warehouses development fall into three main categories. First, we are concerned about the actual need for this project, as millions of square feet of warehouse space is currently vacant. Second, this conditional use presents the opportunity to resolve conflicts with the City's Comprehensive Plan as well as the DRI process. And third, there are serious concerns about stormwater and flooding, wetland filling, and construction within the floodplain, both on the development site and on 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 publicly inclusive approach in the decision-making process.

Ogeechee Riverkeeper urges the City of Pooler to take steps to rectify the missed processes related to this proposed project. The clear lack of need and the direct conflict with the City's own planning documents highlights this poor use of land. Looking further to the flooding risks it will create and be exposed to, the project raises more concern. If the project is to proceed, stronger conditions than those currently proposed or in place must be put on this development to prevent foreseeable harms.

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 deny or otherwise prevent this project from being approved.

The Savannah regional market does not have a demonstrable need for this proposed warehousing and logistics development. 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=94a98d29b2f14009b02655150f484227)

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, whose construction is on hold based on a slow down in the tenant market.

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. Conflicts with the Comprehensive Plan and DRI review process in rezoning

Procedural oversights have consistently occurred at this site and for this project. Both the initial rezoning and this current conditional use consideration have skipped important steps. As a result, the residents who will be most impacted by this project have not had the access to information or the proper opportunities to have their voices heard prior to a final decision. The City of Pooler should reconsider each of these steps and restart those processes. Short of that, a significant number of conditions should be placed on this development before any land clearing or construction is permitted to occur.

The **rezoning** process for this site raises a series of questions and concerns. While it appears that this site was rezoned at the December 19th, 2022⁷ Pooler City Council meeting, important and critical information is missing from the record available on the City's webpage. Most importantly, any information about the Planning & Zoning Commission's review and consideration of the rezoning is absent from Pooler's publicly accessible portal. The December 12, 2022⁸ meeting only includes the agenda. No minutes were included, no vote result was recorded, nor were any documents included that explained the requested rezoning or justified the rezoning decision. This lack of information for the original rezoning differs substantially from the documents that are available for Planning & Zoning meeting⁹ where it considered this conditional use.

The most glaring omission from the original rezoning process was any discussion of the **incompatibility with the Comprehensive Plan**. The City of Pooler adopted its "Comprehensive Plan 2040" on October 18, 2021.¹⁰ It describes the Plan as "the community's principal guiding or 'vision' document," with the goal of "serv[ing] as a resource to both the public and private sector" and "provid[ing] for consistent policy direction."¹¹ The Comprehensive Plan, a result of a collaborative process with the public, was intended to allow all residents a way to plan their future.

However, a little over one year after it was adopted, the City approved this site's rezoning - in direct conflict with the 2040 Comprehensive Plan. As a result, roughly 300 acres of residentially zoned¹² and designated "Residential

⁷ City of Pooler City Council. December 19, 2022. Available at: <https://poolerga.portal.civicclerk.com/event/316/files/agenda/1552>

⁸ City of Pooler Planning & Zoning Commission. December 12, 2022. Available at: <https://poolerga.portal.civicclerk.com/event/328/files/agenda/1539>

⁹ City of Pooler Planning & Zoning Commission. February 9, 2026. Starting at page 25 of 205. Available at: <https://poolerga.portal.civicclerk.com/event/798/files/agenda/2352>

¹⁰ City of Pooler. Comprehensive Plan 2040. Available at: https://www.pooler-ga.gov/wp-content/uploads/2023/09/City-of-Pooler_Resources_Planning-Zoning_Comprehensive-Plan_2016-2040_Full.pdf.

¹¹ City of Pooler. Comprehensive Plan landing page. <https://www.pooler-ga.gov/resources/comp-plan/>

¹² Comprehensive Plan 2040. At page 119.

Homestead” Character Area¹³ to become industrial. The 2040 Comprehensive Plan’s Future Land Use Map had designated these properties and this area as “Residential,”¹⁴ which is defined as “The predominant use of land within the residential category is for single-family, multi-family, townhome, condominiums, manufactured homes, and manufactured home park district dwelling units organized into general categories of net densities.”¹⁵ The Residential Homestead Character Area is described as “characterized by grid street patterns, pedestrian circulation, architectural character, and a sense of community,” and excludes Industrial zonings from its future plans.

This conflicting rezoning goes against the basic purpose of the Comprehensive Plan. The Plan is supposed to give residents a clear idea of the character of an area and what kinds of development that area might see. Such a significant deviation from that plan prevents residents from believing or relying on this Plan in the future. The City had the opportunity to signal its openness to transform the area from residential to industrial - but it did not. Worse, it made this rezoning without any apparent consideration of the Comprehensive Plan. The City Council minutes do not note any discussion of the Plan, and with any information from the Planning & Zoning Commission, there is no evidence that the impacts to and conflicts with the Comprehensive were ever discussed. Even Pooler’s draft 2046 Comprehensive Plan still designates the Character Area for these properties as Residential Homestead.¹⁶ This non-adherence and lack of any attention to the Comprehensive Plan should concern current and future Pooler residents that the Plan and its information are unreliable, an afterthought for the City, and will be changed without notice.

The **lack of attention to process has extended to the DRI process** for this conditional use consideration. DRIs not only give the deciding jurisdiction (here, Pooler) important information about significant projects, it gives affected parties and the general public the same. The transparency of this information is vital for affected parties and the public to provide informed, meaningful, and constructive comments and feedback on a project. It is also a mandatory process under Georgia’s state law.¹⁷ Most relevant here, the rules governing the DRI process state that “[t]he local government may not take final action approving the project or any other action including but not limited to permitting while the DRI process is ongoing.”¹⁸ The City of Pooler did not follow this process. The initial Planning & Zoning Commission meeting on this topic took place on February 9, 2026. Pooler City Council took its apparent final action on this conditional use on April 6, 2026.¹⁹ Pooler’s DRI application was not submitted until April 14th, 2026 - after the final action was already taken. In addition, the project’s original rezoning in 2022 would have likely passed the threshold to require a DRI.

The effective result of these two actions - the 2022 rezoning and this 2026 conditional use consideration - is a disregard for transparency and public engagement. The Comprehensive Plan, the result of public input, was not only ignored but was changed without acknowledgment. The impacts to the residents who relied on the Comprehensive Plan was apparently not considered, nor was their feedback sought. The latest consideration of a new conditional use

¹³ Comprehensive Plan 2040. At page 121.

¹⁴ Comprehensive Plan 2040. At page 131.

¹⁵ Comprehensive Plan 2040. At page 132.

¹⁶ City of Pooler. Draft 2046 Comprehensive Plan. At page 113. Available at:

https://www.pooler-ga.gov/wp-content/uploads/2026/04/City_of_Pooler_Resources_Comp_Plan_2046_2026_Final_Draft_Version_4_10_26-for_web.pdf.

¹⁷ Georgia Rules & Regulation § 110-12-3. Available at: <https://rules.sos.ga.gov/gac/110-12-3>

¹⁸ Georgia Rules & Regulation § 110-12-3-.01(2)(b). See also § 110-12-3-.03(3) & (4).

¹⁹ City of Pooler City Council. April 6, 2026. Available at: <https://poolerga.portal.civicclerk.com/event/774/files/agenda/2397>

failed to follow the DRI process, harming affected parties and the public's ability to meaningfully participate in the process. Likewise, the original 2022 rezoning should have also been subject to the DRI process.

Summarizing the procedural missteps to this point:

- The 2022 rezoning was in direct conflict with the 2040 Comprehensive Plan,
- The 2022 rezoning failed to acknowledge, address, or amend the 2040 Comprehensive Plan,
- The 2022 rezoning was not submitted to the CRC for assessment of whether the DRI threshold was crossed, which would have likely resulted in a DRI notice and comment period,
- The 2026 conditional use was voted on before a DRI assessment took place, and
- The 2026 conditional use was submitted to the CRC for DRI assessment after the final action was taken.

Despite all of these concerns with process, the City of Pooler can still address the related concerns. The City should place additional conditions on the project beyond the 7 currently in place. Guided by the City of Pooler's Zoning Ordinance,²⁰ ORK strongly encourages the City of Pooler to place conditions on this project that address its foreseeable impacts, especially as they relate to preventing or reducing impact to adjacent and nearby residents. These conditions should include, but not be limited to:

- 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;
- 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. NOTE: This should also include considerations related to the existing pond on the site;
- 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;

²⁰ City of Pooler. Code of Ordinance. Appendix A, Article V §§ 7 & 10. The City of Pooler should also be informed by any other relevant guidance in its Code of Ordinances

§ 7 - https://library.municode.com/ga/pooler/codes/code_of_ordinances?nodeld=PTIICOOR_APXAZO_ARTVPRADEN_S7STCOUSPE

§ 10 -

https://library.municode.com/ga/pooler/codes/code_of_ordinances?nodeld=PTIICOOR_APXAZO_ARTVPRADEN_S10STZOORMAA
[M](#)

- 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;
- Canal Protection - a detailed explanation of why the Savannah-Ogeechee Canal must be crossed, alternatives considered and reasons why they were not selected, and a requirement that a final decision on crossing the Canal be made by a vote of the Pooler City Council at a Public Hearing;
- 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.

3. 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 “Buffers, additional landscaping and retention ponds will be maintained or installed to mitigate and control stormwater.”²¹ Beyond this single sentence, the only other note of stormwater management is that there will be 17.1 acres of “ponds,” according to the Development Site Plan. This is insufficient, especially considering the amount of wetlands and 100-year floodplains present on the site. 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.

²¹ DCA. “DRI #4697 DEVELOPMENT OF REGIONAL IMPACT DRI Information Form Part 2” Available at: <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4697>

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 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 60% impervious surface coverage of the approximately 121.4-acre²² site, this proposal will create approximately **72.84 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.

²² Based on the acreage for property parcels 50987-06001, 50987-06010, and 50924E06001 available on qPublic. See <https://qpublic.schneidercorp.com/Application.aspx?AppID=1094&LayerID=27085&PageTypeID=1&PageID=10978&Q=451192435&KeyValue=50987+06001>.

Finally, the proposed location for this development faces serious and sustained **flooding risks**. Flooding, and its associated damages and pollution risks, will be an ongoing and growing issue on this site. Careful site design and layout should consider and protect the neighboring and nearby property as well as the natural areas around this site.

Flooding is very likely at this location. FEMA's designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A,²³ should draw specific attention. While the "100-year floodplain" name implies that floods will only occur once every 100 years, this obscures the actual risk. Over a 30-year period, the actual flood risk is 26%²⁴ - a more than 1 in 4 chance for properties in the 100-year floodplain over that time.

The "100-year floodplain" only looks narrowly at the "base flood." The base flood describes the strength of flood that is 1% likely to happen in any year.²⁵ Non-base floods, *i.e.* floods less strong or severe than the base flood (aka the "100-year flood"), are more likely to happen each year. Likewise, the 100-year flood is not the absolute strongest possible flood that the property could face. The narrow focus on the 100-year flood not only undercounts the potential frequency of flooding on the property but also underconsiders the severity of flooding the property could experience.

Further, reliance on the backwards-looking 100-year flood model further obscures risk. The estimates of floods and the extent of the floodplains rely on historic data, leaving out the most recent and most representative data. With the anticipated increase in storm frequency and intensity in the coming years and decades, the extent, size, and frequency of flooding on this property is likely greater than the Flood Hazard area anticipates.

The project's current layout presents serious concerns about flood risk and damage. Building 2 is planned to be placed squarely in Zone AE. Significant portions of the internal roadways are also planned to cross Zone AE floodplains. Finally, the "Chatham County Proposed Access Road" that would cross the Savannah-Ogeechee Canal appears to be entirely within Zone AE. Beyond the 100-year floodplain, nearly the entirety of Buildings 1 & 2 are within the 500-year floodplain. Construction within these known flood hazard areas risks not just structural damage on site, but risk pollution on debris leaving this property and impacting others in the area.

Alternative site layouts might help reduce the worst of these harms. **ORK strongly discourages the construction of any structure in the 100-year floodplain due to the growing risk of serious flooding.** The City of Pooler should consider adding a condition to this conditional use that prohibits any construction within the 100-year floodplain (aka a Special Flood hazard area). An additional 50-foot buffer builds in further resiliency, as FEMA's floodplain maps were last updated in 2018 at this location. Further, including a floodplain overlay on the Development Site Plan will help to highlight those areas of greatest concern. ORK urges the City of Pooler and the developers to center flooding risks in site design.

Finally, 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

²³ Federal Emergency Management Agency (FEMA). "Zone A." See: <https://www.fema.gov/about/glossary/zone-a>.

²⁴ See <https://savannahga.gov/FAQ.aspx?QID=332> and <https://www.floodsmart.gov/flood-zones-and-maps>

²⁵ Federal Emergency Management Agency. "Appendix B: How to Read a Flood Insurance Rate Map (FIRM) Course Glossary". Available at: https://emilms.fema.gov/is_0273/groups/157.html

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 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 buyout²⁶ 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.²⁷ 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 attachment 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
- Design features, additional buffering, and intentional site layout to reduce flooding-related damages on the site, to neighboring properties, and to the natural environment, and
- Pooler risks the possibility of bearing costs related to FEMA buyouts.

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.

²⁶ 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

²⁷ 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>

In the last month, there have been four²⁸ 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

²⁸ (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.