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Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

April 29, 2026

Via E-Mail

Coastal Regional Commission
planning@crc.ga.gov

Re: Comments on DRI #46393 - The District (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 District development fall into two main categories. First, we are unclear about the process of this development and DRI, including what action is under review and the current stage of development. Second, we have concerns about stormwater and flooding, wetland filling, and wastewater management on the development site, but cannot provide specific or detailed comments and feedback with the publicly shared information.

Additionally, ORK wishes to share our general 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 requests that DRIs be submitted and shared publicly as they are applied-for, not all at once as we have here. ORK encourages deadline extensions and leniency where warranted for comment collection, and urges a careful, methodical, and publicly inclusive in the decision-making process.

1. Clarity needed in the DRI and City decision process

This DRI application is not clear on the basic purpose or actions being considered. Without clarity on what is being proposed, it is difficult for the public to meaningfully participate in this review process. In the future, ORK urges

the applicant and DRI submission to better communicate the details, purpose, status, and design of the project so that the community members who will be most impacted are provided detailed information and can share constructive feedback. Should it become clear that the public was confused, misunderstood, or was otherwise prevented from providing meaningful comments, ORK urges the CRC to require this DRI to be resubmitted and open a second public comment period.

The action under review in this DRI is not made clear. Nowhere in the documents provided is it clearly stated what action is under review. While the Initial DRI Information form¹ notes that the action sought is a “Rezoning,” the DRI Public Notice email appears to state that a rezoning already occurred. Is a rezoning taking place here? What is the current zoning of the property - R1A or PUD? What zoning is ultimately planned for the proposed development, something different than R1A or PUD? Further, if a rezoning is not occurring, what action is being reviewed in this DRI? The Initial DRI Information form does not indicate that any other action is being taken or under consideration. ORK requests clarification on this question.

The stage of development is also unclear for this project. Some aspects, including water and sewer connection as well as the traffic study appear to be complete. Other aspects do not appear complete. Specifically, the Master Plan/Development Site Plan/Concept Plan is lacking significant and usable information, even for an initial proposal. Will a more detailed Master Plan be shared before construction begins?

In sum, ORK asks:

- The action(s) under consideration to be clearly stated,
- The ultimate zoning planned for this development to be clearly stated,
- For clarity as to this project’s current state of development,
- For a Master Plan/Development Site Plan/Concept Plan that provides usable information to allow the public to provide meaningful feedback, and
- For a resubmission of the DRI, if it is apparent that the public was sufficiently confused by the information in this DRI.

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, and building in long-term resilience 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. Only a passing reference to that “applicant indicat[ing]” that the development will utilize “Detention ponds/lakes, water

¹ Department of Community Affairs (DCA). “DRI #4693 DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information.” Available at: <https://apps.dca.ga.gov/DRI/InitialForm.aspx?driid=4693>

quality structures, pervious pavers, water reuse for irrigation” is included in the DRI materials.² This is insufficient - now is the time to consider flooding and how stormwaters will be managed on the property. 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 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 70% impervious surface coverage of the approximately 106.74-acre site, this proposal will create approximately **74.5 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

² DCA. “DRI #4693 DEVELOPMENT OF REGIONAL IMPACT DRI Information Form Part 2” Available at: <https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4693>

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.

Additionally, the City of Pooler should require more specificity from the applicants for its stormwater plans. The DRI information notes that, in addition to stormwater ponds, the project will use “water quality structures, pervious pavers, water reuse for irrigation.” First, the City of Pooler should require the applicant to precisely explain what these are. For example, a “water quality structure” could be anything from a mesh filter on a stormwater drain to a water treatment facility. The imprecise language prevents any meaningful feedback from the public and should not reassure the City of Pooler’s staff and decisionmakers. Second, the applicant should share specific plans with the public about how these will be used. What percentage of the property will “pervious pavers” be used on? Will they only occur in specific locations or in specific contexts? And what are the devices, mechanisms, and equipment needed for the development to use stormwater in “water reuse for irrigation.” Without more details or with specific conditions on the development, these imprecise stormwater management options should do very little to reassure the City that stormwater will be successfully managed. But, through implementing these suggested stormwater-related requirements, the City of Pooler will be able to better ensure that this site remains resilient to both present and future flood pressures from stormwater.

Finally, **wastewater management** plans should be specified in detail prior to any approvals being granted by the City. The DRI information does not provide the whole picture of wastewater management. While the City of Pooler will be the wastewater management provider and states that it will have sufficient capacity, the DRI information also states that no sewer line extension is necessary. Is there already sewer interconnection on site? If not, will the site be using a septic system to treat and process the 430,000 gallons per day of wastewater? ORK strongly urges against the use of septic systems, especially at that volume.

In addition, the DRI Information Form Part 2 confusingly states that “Irrigation will be supplemented from detention/lakes to be created on site” within the wastewater section. This seems to imply that wastewater generated on site will remain on site and be used for irrigation. Without more information, this is concerning. Will the applicant have treatment facilities on site to treat the wastewater to a usable standard? If not, what are the public health concerns and precautions that will be used. How does this plan differ from or interact with the plans to reuse stormwater for irrigation. ORK strongly urges the City of Pooler to clarify these plans before any approval.

In summary:

- Stormwater management considerations must be central to any decision on annexation, rezoning, and permitting undertaken 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 74+ 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,
- The other planned stormwater management features should be clarified, and the plans for the implementation should be fully detailed,
- Wastewater management should be clarified, and should avoid the use of septic systems, and
- The applicant should describe in full detail how it plans to use wastewater in on-site irrigation.

3. 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.

Currently, there are four³ separate Developments of Regional Impact under 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

³ (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.