



To: Toby Harris - Community Development Director  
Via email: [tharris@glynncounty-ga.gov](mailto:tharris@glynncounty-ga.gov)

1725 Reynolds St.  
Suite 200  
Brunswick, GA 31520

Date: February 7, 2024

RE: Comments on the Draft Glynn County Zoning Ordinance

To Whom It May Concern:

Thank you for your time and dedication to the betterment of this community and the opportunity to comment on the draft zoning ordinance. I'm Lericia Harris – South Coast Advocate for One Hundred Miles.

One Hundred Miles (OHM) is a non-governmental organization with the mission to preserve and protect Georgia's 100-mile coast through education, advocacy, and community engagement. Our comments are reflective of our beliefs.

The zoning ordinance is the single-most important policy that will determine the future of our community. Zoning impacts every aspect of our daily lives and it's essentially the blueprint for economic growth and quality of life for decades to come.

The process of revising Glynn County's outdated zoning ordinance has been lengthy. It now threatens to destroy Glynn County's unique character, which is the economic driver that leads people to visit, relocate, build businesses, and raise families in our Golden Isles. As such we offer the following comments:

**1. DEVELOPMENT IN THE RIGHT PLACES:**

- a. Section 5.1.1: FA—Much of Glynn County is undeveloped. These rural areas are important because they provide farmland, timber, recreational opportunities like hunting, fishing, hiking, wildlife habitat, clean water, and quiet for people who choose to live outside of busier developed areas. They are also important to a county's fiscal resources since rural development has a lesser impact on roads, schools, and water/sewer services. Rural zoning is a tool used by county governments to manage fiscal investments in infrastructure, preserve a community's working landscape and recreational opportunities, and protect rural residents' quality of life.
  - i. The purpose of the FA (Forest Agriculture) provision is to ensure that land in Glynn County can "be utilized and reserved for agricultural purposes, as well as residential uses, certain specialized recreational, and other public purposes. To encourage the formation and continuance of a compatible environment for public and recreational areas, and agricultural uses; and to discourage any encroachment by incompatible housing developments, scattered commercial and/or industrial operations, or other uses capable of adversely affecting the basic agricultural or open character of the district."
  - ii. We agree with this intent and with the theory of having a rural zoning category for West Glynn and the North End of St. Simons Island.

Unfortunately, the ordinance assigns a density of 2 units per acre for rural properties in FA zoning. If large tracts of land in rural areas are developed at 2 units per acre, the new development would throw Glynn County's infrastructure planning and investments upside down. New schools would need to be prioritized in rural areas, sewer and water infrastructure would need to be extended in built, and roads would need to be widened—all in areas where these infrastructure investments are not currently planned. Additionally, existing residents and current opportunities provided by Glynn County's rural areas would be threatened and/or pushed out.

1. **Recommendation: Ensure that the density designation for FA supports and preserves rural Glynn County. Do not assign a density higher than 1 unit per 5 acres (even lower, such as 1 unit per 10 acres, is preferred.)**
- b. Section 2.10: Conservation Subdivisions—A conservation subdivision ordinance is a growth management tool that protects ecologically sensitive areas from high density developments. We are optimistic about the inclusion of a conservation subdivision provision in the draft. However, it is not clear that the county is thinking of the conservation subdivision in a broader, comprehensive context. The value of a conservation subdivision is to allow for development in rural areas, while maintaining connections for wildlife, recreation, and other ecosystem values throughout the landscape. Conservation subdivisions should not just be thought of from the perspective of the individual property that is being developed, rather from this more regional perspective. As such, conservation subdivisions are more valuable in rural areas and not valuable in developed areas. Conservation subdivisions should be offered as the only PD option in areas with the underlying zoning of FA. They should not be available to properties in any other underlying zoning area.
- i. **Recommendation:**
    1. **Make the conservation subdivision requirements mandatory (rather than voluntary) as the only PD option for properties with the underlying zoning of FA.**
    2. **Do not allow conservation subdivisions as a PD option in any other zoning district in Glynn County.**
    3. **The ordinance currently states that conservation subdivisions are not available for use in areas without infrastructure. Assuming this means sewer and water, this requirement is counter to reason. Conservation subdivisions should be used to preserve rural places that do not need sewer and water. Therefore, they should be prioritized as a tool to prevent the need to extend sewer and water to serve development in rural areas.**
    4. **Increase the minimum amount of conservation area within a development from 30% to 50%.**
- c. Regulating impervious surface areas is an environmental effort to promote a healthy drinking water supply. Increased impervious surfaces reduce infiltration and increase surface runoff. The county's Water Resource Protection Ordinance is supported by a "stormwater management design manual" that the county updated in 2021. The design manual includes performance standards that allow for green infrastructure and on-site stormwater management for any new or re-development that is over 5000 sq feet of impervious surface or disturbance greater than 1 acre. While these current standards are great to have in place, the

county could provide further protections in the zoning ordinance by establishing limits based on the type of development and the location.

- i. Recommendation: The county should limit the impervious cover of new developments (buildings and parking, etc...) within a certain proximity of marshes, wetlands, creeks, and streams.**
- d. Studies show a wide range of benefits to redevelopment (repurposing sites already in use), rather than developing new natural areas. It is an efficient land use strategy that preserves green space and prevents sprawl, along with many other environmental and community benefits.
  - i. Recommendation: The county should consider redevelopment of various properties as a first option based on the property's overall sustainability, qualities, and potential.**

## **2. PEDESTRIAN & CYCLIST-FRIENDLY TRANSPORTATION CORRIDORS:**

- a. Though a bicycle and pedestrian framework currently exists, there are infrastructure gaps that hinder the ability to use the network as a practical form of transportation. The zoning ordinance does not mention anything about boosting or advancing this form of travel.
- b. Article 5: District Provisions—Every new development brings more traffic to our roads, especially if developments have only one way in and out, are not mixed use, and are not built with sidewalks and bike lanes. many studies show that streets that accommodate multiple types of users provide multiple benefits to a community.
  - i. Recommendation: Work with local organizations such as *Bike Walk Golden Isles* to address the infrastructure gap and adopt a county-wide complete streets ordinance that provides more opportunities for safe cycling and walking and for use in all new development in the Residential Districts (Sec. 5.2) and the Commercial and Mixed-Use Districts (Sec. 5.4).**

## **3. ECOSYSTEM SERVICES AND WILDLIFE CONSERVATION:**

- a. Section 2.3: Buffers—Buffers provide important protections for our community. They screen noise, sound, and sight between neighboring properties in developed areas. They also protect natural resources, like marshes and wetlands, from runoff from impervious surfaces, while wetland buffers protect built structures from flooding. The benefits to both our water resources and communities have been scientifically proven. Buffers are a best management practice that Glynn County should continue to require.
  - i. The draft zoning ordinance addresses salt marsh buffers in section G on page 21. It states that the required buffer should be: "As determined by the Georgia Department of Natural Resources of 15 ft., whichever is greater." We are happy to see the inclusion of a salt marsh buffer in the draft zoning ordinance. During recent work sessions and as has been reported in the media, some members of the Mainland Planning Commission have expressed skepticism about the need to include marsh buffers in the ordinance at all. This is concerning because of scientifically proven benefits buffers provide to homeowners in terms of flood protections and to our wetlands in terms of water quality.
    - 1. Recommendation: We urge you not to remove the buffer provision and instead to make the county buffer requirement reflect the state buffer requirement, which is 25-feet.**

b. Greenspace, or areas of vegetation set apart for recreation or aesthetic purposes, provides social, economic, and environmental benefits. Greenspaces provide ecosystem services, have been linked with better physical and mental health, and can add aesthetic values that can benefit property values and neighborhood pride. Setback and buffer requirements currently found in the zoning ordinance do not fulfill the community need for greenspace. As Glynn County continues to grow, it is important to be intentional about how people can further benefit from the built environment by utilizing the natural environment that has already been provided to us.

**i. Recommendation:**

- 1. Require new developments to set aside a percentage of their site as open greenspace.**
- 2. Incentivize greenspaces that can serve as recreation while also preserving the natural character of the site, such as walking trails.**

c. Maintaining tree canopy offers shade, improves water and air quality, and preserves the aesthetic character of our neighborhoods. These factors influence what is called "a sense of place", or the proud relationship between people and the places they live, work, and play. Southeast Georgia is home to some especially notable specimen trees that bolster this sense of place, particularly live oaks. Tree preservation ordinances and requirements protect certain tree species from removal and maintains tree canopy. Unfortunately, land is often clear-cut during development for its cost effectiveness. This not only negatively effects the wildlife that calls Glynn County Trees home, but also weakens the ecosystem benefits provided to humans. There is a tree preservation requirement already included in the zoning ordinance, but it only refers to Saint Simons Island. Mainland Glynn County is being overlooked in this regard, and as Glynn County continues to grow and develop, protecting the mainland trees is more important than ever.

**i. Recommendation:**

- 1. Expand tree preservation requirements to mainland Glynn County.**
- 2. Identify areas of mainland Glynn County as "Canopy Roads" or "Tree Canopy Preservation Areas."**
- 3. Set requirements for tree plantings in medians and parking lots, with special emphasis places on large, native shade trees over decorative trees like crape myrtles.**
- 4. Incentivize tree plantings and preservation as community flood mitigation.**

**4. LIGHTING:**

a. Artificial lighting poses a significant annual threat to threatened loggerhead sea turtles in Glynn County, by deterring adult females from nesting and causing hatchlings to become misoriented as they emerge from their nests. Overall, there are three primary concerns when addressing the effects of artificial light on nesting sea turtles: 1) the quantity of light, 2) the quality of light, and 3) the directionality of light. The current and draft ordinance deal only minimally with the quantity of light and do not address the necessary components of quality (wavelength) or directionality.

- i. Recommendation: We ask that you continue to work with the experts at the St. Simons Island Sea Turtle Project and Georgia Department of Natural Resources to develop an effective beachfront lighting**

**ordinance that fulfills its stated purpose of protecting sea turtles on our beaches. This is an urgent conservation concern that needs to be addressed before the upcoming summer nesting season.**

**5. PUBLIC ENGAGEMENT:**

- a. The public should be notified of this on-going process in a better way. How can residents be engaged if they are unaware of the open comment opportunities that are happening?
  - i. **Recommendation: The committee should collaborate with local grassroots organizations to spread the word about public chances to comment on the zoning revision. Also, ensure all media outlets have been informed – meaning social, news, radio, and print. Members of the zoning review committee and the overall commission have mentioned the various experts within our community – we urge you to lean on those experts and provide additional/better opportunities to garner their support and let their concerns to be heard.**

This revision and discussion regarding zoning in Glynn County has been in the works since before COVID. This process has been tedious and confusing for some. It's time to decide what is best for Glynn County. Yes – be thorough, efficient, and effective. Also – be fair, inclusive, and open.

OHM is engaged in this process because, like you, we are invested in Glynn County and are living and raising our families here. More than anything, we want our community to grow and succeed, now and into the future.

Again, thank you for the opportunity to comment on the draft zoning ordinance. Contact me any time if I can be of assistance or if you have any questions regarding these comments - [lericia@onehundredmiles.org](mailto:lericia@onehundredmiles.org) or 912-506-6274.

Sincerely,

Lericia Harris  
South Coast Advocate  
One Hundred Miles