

To: Glynn County Zoning Committee
C/O: Stefanie Leif- Planning Manager
Via email: zoningupdate@glynncounty-ga.gov
1725 Reynolds St.
Suite 200
Brunswick, GA 31520



Date: August 23rd, 2024

RE: Comments on the August 2024 Draft Glynn County Zoning Ordinance

Thank you for your time and dedication to the betterment of Glynn County and for the opportunity to comment on the draft zoning ordinance. Please accept the comments submitted on behalf of the members and Board of Directors of One Hundred Miles (OHM), a non-governmental organization based in Brunswick. Our mission is to preserve and protect Georgia's 100-mile coast through education, advocacy, and citizen engagement. These comments are reflective of our beliefs.

Glynn County's 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 is the blueprint for economic growth and quality of life for decades to come. The comments in this letter are based on the Redlined Draft Zoning Ordinance made public on August 8th, 2024.

Sustainable Development

- The Forest Agricultural (FA) zone's rural character should be maintained and protected. FA zones are reserved for agricultural purposes. Further, development and service extension in this area would pose a fiscal burden on the county's limited resources. To achieve this in the FA zone, we recommend:
 - o Keep the allowed density low, ideally:
 - Island FA (Sec. 5.1.1.)
 - 1 unit per 5 acres
 - Maximum site coverage: 20%
 - Mainland FA (Sec. 5.1.1.)
 - 1 unit per 10 acres
 - Max site coverage: 10%
 - o Prohibit water or sanitary sewer treatment plants or aeration facilities as allowable uses for FA. (Sec. 3.2.)
- The Conservation Preservation (CP) zone is intended to preserve, and control the development of land, marsh, and water areas that are considered environmentally sensitive. CP includes marsh and low-lying property prone to flooding, making development on these properties vulnerable. To continue using CP as a conservation tool, we recommend:
 - o Change all uses currently listed as permitted (P) under CP in the Use Table to special use (S), requiring approval based on the impact the proposed activity would have on the unique resources that warrant the CP designation. (Sec. 3.2.)
 - o Reduce the maximum site coverage from 60% to 5%. (Sec. 5.1.2.)
- Conservation Subdivisions are used as tools to preserve rural landscapes and habitats, while still allowing building on developable land, just directed away from natural areas of interest. Conservation Subdivisions can be utilized to address the differing needs of both

rural and urban parts of the county. Our recommendation would be to specify two different types of Conservation Subdivisions with the following characteristics:

- Rural Conservation Subdivisions (Sec. 2.10.)
 - Create conservation subdivision type with the goal to preserve rural character and uses of Glynn County. (Sec. 2.10.)
 - Only allow on land with a base zoning of FA. (Sec. 3.2.1.)
 - Do not require infrastructure extensions to the Conservation Subdivision, encourage these developments to use septic and wells safely. (2.10.3.)
 - Do not prohibit agriculture or forestry. (Sec. 2.10.4.B.)
 - Prohibit golf courses on the mainland. (Sec. 2.10.4.B.)
 - Require at least 60% of the conservation subdivision to be dedicated as conservation area. (Sec. 2.10.5.C.)
 - Require the conservation land to be held in perpetuity. (2.10.2.)
- Urban/Suburban Conservation Subdivision (Sec. 2.10.)
 - Create conservation subdivision type with the goal to create parks and greenspaces for recreation and preservation of natural, archaeological, and historical resources. (Sec. 2.10.)
 - Allow on all land zoned PD east of Interstate-95 and south of Sea Island Road. (Sec. 5.6.2.)
 - Utilize the existing language currently found in the Zoning Ordinance Draft. (Sec. 2.10.)

Pedestrian and Cyclist Safe Transportation

- Though a bicycle and pedestrian framework currently exists, the county does not have a comprehensive bicycle and pedestrian master plan. As such, there are infrastructure gaps that hinder the ability to use the network as a practical and safe form of transportation for commuters. The zoning ordinance does not mention anything about boosting or advancing non-vehicular forms of travel. To achieve pedestrian and cyclist safe transportation, we recommend:
 - Incorporate a Complete Streets section into the zoning ordinance to address the infrastructure gaps. Such a county-wide section of the zoning ordinance will provide 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.). More information on Complete Streets Ordinances and how to adopt them can be found at [Smart Growth America](#).
 - Work with local organizations such as *Bike Walk Golden Isles* and other community groups to develop a comprehensive bicycle and pedestrian master plan to guide all transportation-related activities in the county.

Ecosystem Services

- Tree canopy offers shade, improves water and air quality, and preserves the aesthetic character of Glynn County neighborhoods and developed areas. Tree preservation ordinances and requirements protect certain tree species from removal and maintains tree canopy. There is a tree preservation requirement already included in the zoning ordinance, but it only refers to St. 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. To achieve this, we recommend:
 - Expand the St. Simons Island Tree Preservation requirements to mainland Glynn County. (Sec. 2.9.)

- o Establish a Tree Board as part of the application review process to review Tree Plans and make recommendations. (Sec. 2.9.6.)

Protective Buffers

- We are encouraged by the inclusion of the 100-ft required buffer between Basic Industrial (BI) and residential uses to help preserve the health and quality of life of residents living near industrial areas. To strengthen and expand this buffer, we recommend:
 - o Increase the buffer size between existing adjacent zoning and Limited Industrial (LI) and General Industrial (GI) from the Type B buffer to the Type C buffer size (100-ft). (Sec. 2.2.3.E. Zoning Buffers Table)
 - o Add a vegetated 12-ft berm as a requirement within the buffer. Vegetated berms help cut down on visual, noise, and dust pollution from the industrial operations. If the "landscape wall" mentioned in the ordinance is intended to be a berm, then that language needs to be clearer. (Sec. 2.3.3.A.)
 - o Vegetation included in the buffer must be native. This not only ensures ecological health but can make maintenance of the vegetation easier and less costly. (Sec. 2.3.3.B.)

Responsible Outdoor Lighting

- Responsibly designed and properly maintained outdoor lighting helps to prevent the negative impacts of artificial lighting on humans, numerous wildlife species, and the quality of life for our coastal community. Research has shown that poorly executed outdoor lighting has negative impacts on human health, and increases the likelihood of individuals contracting diabetes, depression, sleep disorders, and even some cancers ([DarkSky International](#)). Outdoor light sources should be limited to where it is needed, and only in amounts necessary to lessen the impacts on both humans and wildlife. Responsible lighting will also serve to minimize sky glow, "an increase in the apparent brightness of the sky" resulting from integrated brightness of the entire night sky over populated areas. Better quality lighting also provides lower operational costs for the County. To achieve responsible outdoor lighting, we recommend:
 - o Set a maximum of 3000 Kelvin or less for all exterior lighting (Sec. 2.8.3). This aligns with Georgia Power's own standard for street lighting as well as the recommended maximum in the American Medical Association (AMA)'s 2016 report, *"Human and Environmental Effects of Light Emitting Diode (LED) Community Lighting."*
 - o Ensure that all changes to the Beachfront Artificial Lighting (2.8.8) section by Georgia Department of Natural Resources (GA DNR) biologists and St. Simons Sea Turtle Project leaders are adopted, in order to protect Glynn County's sea turtle species. These include:
 - Remove *"including frontal dunes"* from the introduction. Beachfront exterior artificial lighting is permitted on nesting beaches of Glynn County, ~~including frontal dunes~~, during nighttime throughout the sea turtle nesting season (May 1 – October 31) only under the following conditions.
 - Add to Sec 2: Exterior artificial light fixtures which are specifically prohibited include the following:
 - d. Fixtures that are not completely shielded by an opaque material blocking direct view of bulbs or diodes from the beach.
 - e. Lighting that is decorative in purpose and intent.

- Add the following section, which is necessary to adequately protect nesting and hatching sea turtles on Glynn County beaches:
 - B. Prohibition of certain beach activities utilizing artificial lights and lighting affecting sea turtles.
 - (1) Authorized vehicles operating on the beach on a routine, non-emergency, basis must be equipped with forward facing lights, sufficiently bright for safe operation, producing light wavelengths not less than 560nm.
 - (2) The use of lanterns, flashlights, or any other portable light source except 'turtle-safe lighting' producing light wavelengths not less than 560nm. Turtle-safe lighting has been specially designed to emit only long wavelength light (amber or red LEDs producing light wavelengths not less than 560 nanometers) that is not disruptive to nesting sea turtles or their hatchlings.

Thank you for the opportunity to comment on this draft. We urge you to adopt these changes and finalize an updated draft this fall. Should you have any questions about our comments, please do not hesitate to contact me at megan@onehundredmiles.org or (912) 223-8608.

Sincerely,



Megan Desrosiers
President/CEO
One Hundred Miles