



Adam S. Poppell, III,
Attorney for McIntosh County
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Dear Mr. Poppell and Members of the McIntosh County Planning Commission,

Thank you for the opportunity to provide comments on the newly proposed Section 219: Hog Hammock District. One Hundred Miles (OHM) is a non-profit coastal conservation organization charged with protecting Georgia's 100-mile coast through advocacy, education, and community engagement. We appreciate the County's efforts to establish a zoning district intended to support the historic Hogg Hammock community. We respectfully encourage continued collaboration with Sapelo Island's Gullah Geechee residents to ensure the ordinance reflects community priorities and advances the stated goals of cultural preservation, sustainable development and protection from displacement.

Please accept the following recommendations on behalf of OHM.

The Draft Ordinance as Written: Section 219(a) states that the purpose of the HH District is to support the continued use and activities of the Hog Hammock community while addressing concerns related to historic resources, traditional development patterns, land speculation, and housing forms. The ordinance further states its intent to reserve the area for low-intensity residential and cottage industry uses that will not contribute to land-value increases that could displace the indigenous population.

Under Section 219(b)(1), permitted principal uses in the HH District include:

- Single-family detached dwellings (site-built)
- Single-family detached dwellings (modular)
- Mobile/manufactured homes

Permitted accessory uses include:

- Accessory uses customary to a dwelling
- Home occupations
- Guest houses or accessory dwelling units

Furthermore, Section 219(c)(6) limits impervious surface coverage to 4,356 square feet per lot. Sections 219(c)(8)-(10) establish a dwelling-unit size range of 720 to 1,800 square feet and limit density to one single-family dwelling unit per lot.

OHM's Concern: This language creates a loophole that would result in the construction of homes larger than 1,800 square feet under roof.

As written, the ordinance could allow guest houses or accessory dwelling units that are larger than the primary dwelling unit. Specifically, according to the ordinance, a lot could potentially include a primary dwelling that complies with the 1,800-square-foot limit while also accommodating a significantly larger accessory structure, anywhere between 2,556-3,636 square feet, provided the overall impervious-surface cap is not exceeded. This could potentially result in lots with two homes, one that is 1,800 square feet and a "guest house" that is much larger—even potentially double the size of the primary dwelling unit.

This outcome would be inconsistent with the district's stated purpose of maintaining the traditional scale and character of development within Hogg Hummock.

Recommendation 1.: Work with community members to determine an appropriate size maximum size for guest houses or "accessory dwelling units" and incorporate that separate standard into the ordinance.

Recommendations 2.: The effectiveness of any zoning ordinance depends not only on its language but also on transparent implementation, consistent administration, and meaningful community engagement. The residents of the HH community should have confidence that decisions affecting the district are made through clear, accessible processes, with opportunities for community input. Moreover, the HH community expects the county officials to conduct regular inspections and consistently enforce the codes. Establishing regular channels of communication between residents and county officials can help build trust, improve transparency, and strengthen long-term stewardship of the district.

For this reason, we recommend consideration of an HH Community Working Group composed of community members and Sapelo-based organizations.

An HH District Community Working Group could serve as a recognized advisory body that facilitates communication between the community members and groups, county staff, applicants, and decision-makers regarding land-use matters affecting Sapelo Island. With proper engagement, zoning ordinance enforcement can be considered an important partnership between community members, who are the eyes and ears on the ground, and the county or city staff, who interface with landowners on behalf of the county. More importantly, a structured engagement process would help ensure that community knowledge and perspectives inform decisions affecting the future of Sapelo Island. Consultation with the HH District Community Working Group should become an official step in the process to receive a permit to rezone, build, or otherwise alter land on Sapelo Island.

Conclusion: The county always has been and will continue to be a critical partner in the effort to preserve and protect the Gullah Geechee heritage on Sapelo Island. We appreciate the county's work to develop a responsible zoning framework that supports the long-term preservation of the Hogg Hammock community, its Gullah Geechee heritage, and the natural resources of Sapelo Island. We respectfully and urgently encourage the county to address the above-mentioned loophole regarding accessory dwelling-unit size and to establish a formal mechanism for ongoing community engagement and partnership before final adoption of the ordinance.

Thank you for the opportunity to comment. We look forward to continued participation in this important process.

Sincerely,



Megan Desrosiers
President/CEO
One Hundred Miles