

## Community Input – Modules 1, 2A, & 2B

During development of the UDO, Greenville County held three workshops to review draft UDO articles. These workshops included presentations to the County Council and Planning Commission on the following dates:

- Module 1 – March 15, 2022
- Module 2A – January 26, 2023
- Module 2B – August 29, 2023

Each workshop included an opportunity for the community to provide input on the drafts directly to staff and the consultant team. The community could also submit comments to staff following the workshop. This document includes all input received as well as staff's and the consultant team's response to those comments, along with a column indicating whether the comment resulted in a revision to the draft.

We received the most comments on Module 1, which addressed zoning districts and use regulations and included a working draft of the definitions article. Most of the comments on this module involved definitions of terms and how/where farm animals and agricultural uses are allowed. In addition, because the UDO consolidates multiple current ordinances, there were often two definitions for a particular term. The Staff Technical Advisory Committee and the consultant team discussed and resolved all duplicate definitions.

The majority of the Module 2A comments involved riparian buffers. County Council adopted a text amendment in 2023 to implement riparian buffers County-wide, so the current Land Development Regulations already address some of these comments. The UDO addresses others.

The majority of the Module 2B comments involved tree protection. Based on feedback from the County Council, Planning Commission, and community, the proposed tree protection regulations have undergone significant revision since the August 2023 Public Review Draft.

Note the UDO Article numbering has changed since the team posted the Public Review Drafts on the [project website](#). The website includes the drafts for Modules 1, 2A, and 2B, along with the final draft UDO.

| Article        | Page Number | Comment  | Name (If applicable)             | Revision? | Response / Resolution  |
|----------------|-------------|--|----------------------------------|-----------|--|
| 2.1.1          | 5           | Will Article 11: Access & Connectivity apply to both internal and access roads as well?  | Cindy Clark, Planning Commission | No        | Yes  |
| 2.3.3          | 14          | Should we differentiate between gross and net density throughout the document?   | Cindy Clark, Planning Commission | No        | It appears net density is only used (in the current ZO and LDRs) in the context of TNDs. If TND provisions are maintained, agree we need to define "gross" and "net" density. However, this would be specified in Article 22: Rules of Interpretation & Measurement.<br><br>Deleted TND. Confirmed with staff density is based on gross development acreage.   |
| 3.1.1 - A (2)  | 4           | Can we enforce this by stipulating that re-zoning requests can only become less restrictive (compared to adjacent zoning) by one step down the hierarchy? Many times we see rezoning requests from R-S to R-12 or R-10 | Cindy Clark, Planning Commission | No        | The Code already limits subsequent rezoning requests to a more restrictive district; other requests require a 1-year waiting period.   |
| 3.1.4 - A (4)  | 5           | This should contain language to minimize light pollution at night by requiring dark sky lighting in the un-zoned and more rural areas (R-R3, R-R1, and R-S) of the county.   | Cindy Clark, Planning Commission | No        | Staff TAC did not advise a change to applicability of outdoor lighting standards in Article 8.   |
| 3.2.3          | 11          | Livestock should be a permitted use for R-R3 and a conditional use for R-R1 and R-S depending on total available acreage. Also, recommend adding Livestock to Article 23 Definitions and Acronyms                      | Cindy Clark, Planning Commission | Yes       | Revised generally as suggested. Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.  |
| 3.2.3          | 25          | Suggest equipment sales and rental be at least a conditional use in AG   | Cindy Clark, Planning Commission | Yes       | The definition of this use was revised and a new use, "Sales/Service of Agricultural Equipment," was added. General Equipment Sales and Rental is permitted in the new RU-C District. Added "Sales/Service of Agricultural Equipment" as a permitted use in AG.  |
| 3.2.3          | 30          | Recommend making composting facilities a permitted use for AG and Conditional for R-R3   | Cindy Clark, Planning Commission | Yes       | We think this use is too intense for R-R3 (a residential district), but is likely appropriate in AG. Added "Composting Facilities" as a permitted use in AG, but not in R-R3.  |
| 3.3            | General     | Do not see Riding Academies described in this section.   | Cindy Clark, Planning Commission | No        | Riding academies (now termed "equestrian centers") are either a permitted or special exception use depending on the district. There are no conditions in the current Zoning Ordinance, so none were added. The standard special exception conditions would apply.  |
| 3.3.4 - A      | 31          | Again, Need definition for livestock   | Cindy Clark, Planning Commission | Yes       | Complete. Revised generally as suggested. Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.   |
| 3.3.8 - F      | 34          | Why are we prohibiting the use of B&Bs for luncheons or as wedding venues? In more scenic and rural areas this is highly desirable   | Cindy Clark, Planning Commission | Yes       | This current prohibition applies only in residential districts. However, the draft prohibited such events in all districts where B&Bs are conditional (which include AG and residential districts). Revised text to continue prohibition of such events in residential districts. Events would be allowed in the AG district.  |
| 3.3.8 - G      | 35          | This language is confusing. B&Bs are typically stand-alone. Any access to private amenities should be at the discretion of the owner.  | Cindy Clark, Planning Commission | Yes       | This is a current standard. We believe the intent is to clarify that the County's approval of a B&B does not automatically grant permission for B&B guests to use common neighborhood amenities. That would be at the discretion of the B&B owner and in accordance with any covenants that regulate access/use of such common facilities. Revised to clarify.                                       |
| 3.3.12 - A (6) | 37          | What about requirements for new developments in close proximity to existing towers?  | Cindy Clark, Planning Commission | No        | Interesting point. Consultant team reviewed but did not think revisions were needed.   |
| 3.3.13 - B     | 43          | Do we want to add ducks & Geese?   | Cindy Clark, Planning Commission | No        | Use conditions for Community Gardens (Non-Commercial) allow honeybees and chickens. Need staff input on whether to allow ducks and geese as well.<br><br>Staff TAC discussed animals in residential districts on 09-06-22. Decision is to maintain current requirements. Ducks and geese would be considered "farm animals" unless they qualify as a pet (i.e., the animal sleeps inside the house). |

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| 3.4.4 - E (1)    | 70          | 2 acres seems excessive; Consider 1 acre  | Cindy Clark, Planning Commission | Yes       | This is in reference to the ADU configuration allowed based on the lot size (i.e., less than 2 ac and the ADU must be attached/within the principal dwelling). Staff TAC discussed on 09-12-22. Decision is to revise to allow detached ADUs in R-S and more restrictive districts and eliminate the provisions related to lot area. Revised per Staff TAC input.  |
| 3.4.13 - C (1&2) | 83          | Need more research on these requirements.   | Cindy Clark, Planning Commission | No        | This is in reference to the lot size requirements for horses. This acreage appears less restrictive than in many other communities. Left as-is so as not to create nonconformities.  |
| 3.4.13 - D (1)   | 83          | Livestock and horse and ponies are being used interchangeably in a few places.  | Cindy Clark, Planning Commission | Yes       | Revised definition of "farm animals" to clarify equines are excluded.  |
| 4.4.4 - S (2)    | 16          | We need Dark Sky lighting in the un-zoned and more rural areas of the County  | Cindy Clark, Planning Commission | No        | This is a significant departure from current requirements. Staff TAC did not advise a change to applicability of outdoor lighting standards in Article 8.  |
| 4.4.5 - B        | 16          | Will the UDO carry forward the concept of Rural Conservation Subdivisions? If so, we will need larger setbacks to comply with larger exterior buffers   | Cindy Clark, Planning Commission | No        | Unsure about this comment. The reference (4.4.5) is to manufactured home parks which, by definition, are not subdivisions. In any case, Article 22; Rules of Interpretation & Measurement will clarify that the more restrictive requirement controls. So, if the required buffer is 50 ft, but the setback is only 25 ft, the buffer would control.   |
| 23.3             | 7           | "Basement" need to wrap around as a new entry   | Cindy Clark, Planning Commission | Yes       | Revised as suggested   |
| 23.3             | 10          | Day Care Home - needs space between 6 and or  | Cindy Clark, Planning Commission | Yes       | Revised as suggested   |
| 23.3             | 10          | Caretaker/ Watchman's Quarters - Does this mean "person and his or her family" who oversees . . . ?   | Cindy Clark, Planning Commission | No        | Understood--the sentence is a bit awkward. However, the sentence is structured in this way because the person's (caretaker's) family is not necessarily overseeing the non-residential operation.  |
| 23.3             | 11          | Clear Cutting: Does this include topsoil?   | Cindy Clark, Planning Commission | No        | No, but it can damage topsoil.   |
| 23.3             | 11          | Common Open Space: "Common" and "Open" Space have different meanings. It is confusing to conflate to two in this definition.  | Cindy Clark, Planning Commission | Yes       | Definition deleted.  |
| 23.3             | 12          | Composting Facility: Does this include human remains? I recently read an article about a company called Recompose in the state of WA. It is "green" funeral offering which turns bodies into soil. It was the first company in the world to offer the practice when it opened in December 2020.   | Cindy Clark, Planning Commission | No        | No, this definition is only intended to include solid waste (as regulated by SCDHEC. Based on a quick Internet search, we don't believe human composting is legal in SC (though it is in Washington, Colorado, and Oregon, and other states are considering it as well).   |
| 23.3             | 12          | Conservation Subdivisions: In the truest meaning: 1) all dwelling units directly touch permanent open space; 2) the development is built on/within the natural terrain and minimizes the use of impervious surfaces, i.e., LID  | Ms. Clark                        | No        | Eliminated Rural Conservation Subdivisions. No changes to Scuffletown Conservation Subdivisions.   |
| 23.3             | 14          | Density: Recommend differentiating between gross and net density.   | Ms. Clark                        | No        | It appears net density is only used (in the current ZO and LDRs) in the context of TNDs. If TND provisions are maintained, agree we need to define "gross" and "net" density. However, this would be specified in Article 22: Rules of Interpretation & Measurement. Deleted TND. Confirmed with staff density is based on gross development acreage.  |
| 23.3             | 16          | Endangered Species Act: Recommend "Critical habitat" also be defined separately. Greenville County Uniquely has the critical habitat for the endangered species Bunched Arrowhead and threatened species Dwarf Flowered Heartleaf which are only found in the Piedmont Seepage Forest. Highly recommend we create a new overlay district for this habitat | Ms. Clark                        | Yes       | Added definition of "critical habitat." There are 10 total federally endangered (5 species) and threatened (5 species) species found in Greenville County. See <a href="https://www.dnr.sc.gov/species/index.html">https://www.dnr.sc.gov/species/index.html</a> . The Zoning Code & LDR Assessment suggests there was not consensus on establishing a zoning district or corridor to protect endangered/threatened species. |
| 23.3             | 16          | Equipment Sales and Rental: Need to wrap around as a new entry.   | Ms. Clark                        | Yes       | Corrected typo.  |
| 23.3             | 17          | Farm Animals: The definition should include horses. Need a separate definition that more accurately describes livestock   | Ms. Clark                        | Yes       | Revised definition for "farm animals." Excluded horses per Staff TAC input. Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.  |
| 23.3             | 20          | (H) need definition of "Half Lot". We had a subdivision application that had this term and was confusing.   | Ms. Clark                        | No        | The UDO does not use this term.  |
| 23.3             | 20          | Horses in residential zone: This should mean boarding of horses into residential zones is permitted. Does it? Confusing as written.   | Ms. Clark                        | Yes       | Clarified as suggested. Changed "horses in residential zones" to "equine stables." Definition includes boarding.   |

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| 23.3      | 22          | Land Development: Should townhome be listed? Is it assumed in the subdivision of parcels.  | Ms. Clark            | No        | This definition is from the SC Planning Act Sec. 6-29-1110(2). Townhouses (and detached single-family residential) are captured under "redevelopment, construction, subdivision into parcels."  |
| 23.3      | 23          | Light Trespass: Recommend to include light pollution or add new definition.  | Ms. Clark            | Yes       | Revised as suggested. Revised definition of "light trespass" to match the Joint Illuminating Engineering Society/International Dark-Sky Association Model Lighting Ordinance (MLO). Added a definition of "light pollution," also from the MLO.   |
| 23.3      | 25          | Manufactured Single-Section Home: How are we addressing tiny homes in the UDO? Tiny homes do not classify as manufactured homes (built to local, state, or federal code) or as RVs, as defined in this Article. In the last two years, two large tiny home developments have been approved by staff as RV parks: Farmers Cove (2 phases with > 100 lots) and Mountain Grove (193 lots). A third application (Cottages at Mountain Park with 167 lots) was submitted in Jun 2021 (status unknown). We need specific requirements for these developments including a trip generation rate for traffic studies. | Ms. Clark            | No        | Carried forward tiny house subdivision regulations already adopted by County Council.   |
| 23.3      | 35          | Riding Academy: Boarding of horses should not be confined to Riding Academies. It is common practice for land owners to board horses and graze cattle not their own.   | Ms. Clark            | Yes       | Revised as suggested. Changed "riding academies" to "equestrian centers" and significantly expanded definition. Changed "horses in residential zones" to "equine stables." Definition includes boarding.  |
| 23.3      | 36          | Should move below with other Riparian Buffer. Is one definition from the ZO and one from the LDR?  | Ms. Clark            | Yes       | Discussed with Staff TAC. Decision is to eliminate ZO definition. Revised per Staff TAC input.  |
| 2.3.9     | 27          | All the rural village designations on the comp plan are in unzoned areas. Why would anyone choose to zone to RU-V when they can do anything they want in an unzoned area? & Why would they want to go through the cumbersome initial zoning process  |                      | No        | It's an option for property owners who want to protect their property through zoning or for County Council should they choose to proactively zone property, though Council does not typically zone property without landowner consent.  |
|           |             | Foodtrucks?  |                      | Yes       | Staff confirmed a need to address this use. Added provisions for mobile vending to Section 3.5: Temporary Uses.   |
|           |             | Put livestock in R-R1, R-R3, & R-S   |                      | Yes       | Revised as suggested. Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition. |
|           |             | Define term livestock and make it broad to include rabbits, guineas, lamas   |                      | Yes       | Revised as suggested. Revised definition for "farm animals" as suggested. Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.   |
|           |             | Evaluate the term "Horses in a residential zones". The term is not used elsewhere in the UDO   |                      | Yes       | Revised as suggested. This was a carry over from the current Zoning Ordinance, but the use was eliminated from the use table. Removed definition. Added "equine stables" to use table as a replacement.   |
|           |             | Can MVO be applied in Piedmont?  |                      | No        | Not if property is unzoned.   |
|           |             | Affordable housing incentives?   |                      | Yes       | Staff TAC discussed on 09-19-22; decision is to add incentives. Added incentives to Residential Districts, Mixed Residential Districts, and Mill Village Overlay.   |
| Use table | 11          | Add livestock in R-R1, R-R3, & R-S   |                      | Yes       | Revised as suggested. Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition. |
|           |             | Must define livestock. Livestock must be added back to R-R3, R-R1, And R-S   |                      | Yes       | Revised as suggested. Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition. |
|           |             | Horse operations must be permitted in R-R 1 & R-R3 and R-S   |                      | Yes       | Revised as suggested. Changed "horses in residential zones" to "equine stables." Definition includes training and boarding. Equine stables allowed in R-R3, R-R1, and R-S (and other districts).  |

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|         |             | Who is asking for RU-V?   |                      | No        | No revision necessary. This implements one of the place types identified in Plan Greenville County.   |
|         |             | Horses should be allowed in ALL Rural Residential areas whether for private use or commercial use.  |                      | Yes       | Revised as suggested.   |
|         |             | Instead of regulating by zone- regulate by unit. R-6 - R-20 1 unit property R-M8-R-M20 2-4 units (Missing Middle) & R-MA 5 unit   |                      | No        | Staff TAC discussed on 08-29-22; decision is to regulate by dwelling type.  |
| General |             | Consider looking at the zoning to include all activities that are going on right now in zoned areas   | Jim Moore            | No        | No specific edits were made in response to this comments since it was not clear which uses the commenter was referencing. However, the use table incorporates new uses not addressed in the current Zoning Ordinance.   |
| General |             | What are the objectives of the UDO?   | Jim Moore            | No        | To consolidate the Zoning Ordinance, Tree Ordinance, and LDRs; modernize the regulations; streamline procedures where possible; improve organization; etc.  |
| General |             | There is a new zoning district called Rural Village District. It is based on the Rural Village classification in the Comprehensive Plan. Fork Shoals and Ware Place are two examples in our area. This proposed zoning district has several requirements in the Use Regulations. The problem with this is the intent does not match the character of the rural villages that are in the CP plan. The proposed district should be walkable, has a central business and commercial area that is retail that is the centers for commercial and civic activities. There are specific regulations for store fronts. This sounds more like Fountain Inn. The district says nothing about architecture. Fork Shoals and Ware Place are now unzoned and we understand it would require County Council to zone them to apply the proposed district requirements. However these rural villages do not look like the proposed district stated intent and if applied would result in added housing would b out of character. It is unclear who is asking for this classification. Is it necessary? The Consultant said they would look into it. | Jim Moore            | No        | It's unclear to which regulations these comments refer. There are standards for transparency zones (relocated from Article 2: Zoning Districts to Article 9: Building Design), but these are not requirements—they simply allow front setback reductions. RU-V allows detached house dwellings and mixed use buildings. Is the concern that vertical mixed use is "housing that is out of character?" Architecture will be addressed in Article 9: Building Design. |
| General |             | In the draft UDO definitions there is a definition, "Horses in Residential Zones: Keeping and raising of horses for private use only. This does not include boarding of horses." This is a stand alone sentence in the AG zoning regulation. The term "Horses in Residential Zones" does not appear anywhere else in the draft UDO regulations and we asked why is it in the definitions section when it is not mentioned as a regulation in the UDO. We recommended they drop the definition all together. The consultant could not answer the question and said they would look into it.  | Jim Moore            | Yes       | Deleted definition as suggested. This was a carry over from the current Zoning Ordinance, but the use was eliminated from the use table. Added "equine stables" to use table as a replacement.  |
| General |             | The draft UDO shows that livestock are not allowed in RR-1, RR-3 and RS zoning categories. The zoning regulation as written shows livestock are permitted in these zoning categories and one of the reasons folks were willing to accept zoning in our area. The Consultant will check on this because they had the understanding that when the AG zoning came about they were making a distinction between the commercial use of livestock and the personal use of livestock. We pointed out this is not a clear distinction in the existing AG and RR classifications. In addition over 60 percent of the folks that were recently zoned fall into commercial, personal or both types of livestock categories and many do not meet the AG zoning property size requirement.   | Jim Moore            | Yes       | Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.   |
| General |             | Where do donkeys, and mules fall in the regulations? Are they in horses or livestock. We recommended the Horse category be changed to Equine.   | Jim Moore            | Yes       | Revised as suggested.   |
| General |             | There is no definition for livestock. There is too much room for interpretation. For example are guineas, rabbits, emus, lamas, bison, pigs livestock? There needs to be a broad and inclusive definition of livestock.   | Jim Moore            | Yes       | Revised as suggested. Revised definition for "farm animals" as suggested. Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.   |

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| General    |                               | There needs to be clear regulations on if a grandfathered property is allowed to continue their operations after ownership changes or does the grandfather policy apply to the property no matter who owns it. The consultant said it should follow the property but understood that is not in the regulation and should be. We also pointed out the debate on if a grandfathered property wanted to expand their operation could they. This interpretation has gone both ways in the last four years.   | Jim Moore            | Yes       | Clarified as suggested. See Article 19: Nonconformities & Vested Rights.  |
|            |                               | Do chickens count as livestock?  | Kristen Robertson    | Yes       | Clarified as suggested. Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition. Farm animals include chickens and fowl, but "backyard chickens" is still a separate (accessory) use.   |
|            |                               | I can understand why you wouldn't want livestock on one acre because it seems small; however, if we had a Victory Garden type scenario (think WWII), 1 acre and house could easily provide enough forage for a milk goat (or five according to Clemson Extension).   | Kristen Robertson    | Yes       | Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition. |
| Article 23 | Agriculture, Farming          | <b>Agriculture, Farming: Consider Revising as follows to be more inclusive-</b> The science or art of cultivating the soil, producing crops, plants, trees, or shrubs, and/or raising livestock, <b>or live animals</b> or fowl <b>for private, personal or commercial purposes</b> which does not require a tax license by the state of South Carolina.   | Jim Moore            | No        | Unsure whether the addition of "private, personal, or commercial purposes" could conflict with the tax license provision. Left as-is.   |
| Article 23 | Lot                           | Two definitions for Lot - consider combining   | Jim Moore            | No        | There is one definition for "lot" and one for "lot of record." Kept both definitions since they have different meanings.  |
| Article 23 | Barn or stable                | Correct Typographical error and remove the term basement and its definition to a separate definition   | Jim Moore            | Yes       | Corrected typo.   |
| Article 23 | Building Setback Line         | <b>Building Setback Line:</b> A line establishing the minimum allowable distance between the nearest portion of any building excluding steps, gutters, and similar fixtures, and the property line when measured perpendicularly thereto. <b>Consider that several properties in rural zoned areas property lines go to the center of the access road. This reduces the distance for Building Setback by the right of way for the road. Consider changing this to have the Building Setback Line from the edge of the right of way</b>   | Jim Moore            | No        | Staff comment: This is not correct. That was the old way and would no longer be replatted as such and enforced this way.  |
| Article 23 | campground                    | <b>Campground:</b> A site with temporary or permanent campsites, shelters, cabins, or other structures designed or intended for overnight occupancy that is operated for recreation, religious, education, or vacation purposes. A campground includes residential camps ("summer camps") and primitive campgrounds. A campground does include the non-commercial use of private property for camping activities by the property owner or one or more people authorized by the property owner. Consider that the last sentence can be interpreted that private property camping activities are not permitted. <b>Consider changing the last sentence to say. "Campgrounds for non-commercial use of private property for camping activities by the property owner or one or more people authorized by the property owner are permitted as indicated in the Use Table."</b> | Jim Moore            | Yes       | The intent of that last sentence was to clarify the non-commercial use of private property for camping activities by the owner is not regulated by the UDO, but it certainly wasn't clear as drafted. Revised, but in a slightly different way than suggested to be more direct.                          |
| Article 23 | caretaker/watchman's quarters | <b>Caretaker/Watchman's Quarters:</b> An accessory dwelling on a nonresidential premises, occupied by a person who oversees the nonresidential operation 24 hours a day, and his or her family. This definition does not meet what is happening on large RR-1, RR-3 and RS properties. There are properties with accessory dwellings that are on properties with residential facilities. <b>Consider changing this to, "An accessory dwelling on a property, occupied by a person who oversees the nonresidential operation 24 hours a day, and his or her family."</b>  | Jim Moore            | No        | If the caretaker's quarters are on properties with residential facilities, what non-residential operation are they overseeing? Maybe someone taking care of horses? We believe the provisions for "accessory dwellings" cover the noted situations.   |
| Article 23 | cemetery                      | there are two different definitions of cemetery. Combine   | Jim Moore            | Yes       | The intent was to resolve the conflicting definitions. Per Staff TAC input, combined the two definitions.   |

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| Article 23 | Chickens                 | · <b>Chickens:</b> Any member of the species Gallus gallus domesticus, regardless of sex. Chickens kept, raised, or used in accordance with Use Condition 29 are not considered farm animals as defined by the Greenville County Zoning Ordinance, as amended. <b>It appears that the term Agriculture Farming includes fowl. There is a conflict with this definition and Agriculture Farming and Livestock. Consider changing this term as, "Backyard Chickens: Any member of the species Gallus gallus domesticus, regardless of sex. Chickens kept, raised, or used in accordance with Use Condition 29. "See Agriculture Farming or Livestock for Chickens as part of fowl in other Uses."</b> | Jim Moore            | Yes       | Revised to clarify. "Agriculture" on its own is not a listed use; rather, it's a use category. This doesn't conflict with the use "backyard chickens." Relocated "Chickens kept, raised, or used in accordance with Use Condition 29 are not considered farm animals..." to the definition of "farm animal."                     |
| Article 23 | Common Open Space        | · <b>Common Open Space: Consider the following change.</b> Land and/or water within or related to an open space residential development, not individually owned, which is designed, <b>maintained</b> and intended for the common use or enjoyment of the residents of the development or the public, which may contain such accessory structures and improvements as are necessary and appropriate for passive recreational purposes.  | Jim Moore            | Yes       | Deleted definition of "common open space" due to new open space framework in Article 11: Subdivisions & Group Developments.  |
| Article 23 | composting facility      | · <b>composting Facility: Consider a separate definition that is for Composting on private property for private use or small sales. (This is how a lot of horse manure is disposed of)</b>  | Jim Moore            | Yes       | Revised generally as suggested. The definition excludes "composting of material produced on the same lot or multiple lots under the same ownership or control." However, this could be interpreted to prohibit this type of use. Clarified in definition that this is not regulated by the UDO and therefore allowed on any lot. |
| Article 23 | conservation subdivision | · <b>Conservation Subdivision:</b> A residential development where 50% percent or more of the developable land area is designated as permanent open space; thereby permanently protecting significant open space within the parcel. The remaining developable land is subdivided into buildable lots. <b>Consider revising this definition to be consistent with the LDR definition/description and include the buffer requirements.</b>  | Jim Moore            | Yes       | Deleted definition of "conservation subdivision."  |
| Article 23 | corner store             | · <b>Corner Store:</b> A small retail or service business located on a corner lot at the street level. Corner store businesses are limited to newsstands, bookstores, barbershops, beauty salons, bakeries, ice cream and yogurt shops, coffee shops, delis, food and convenience markets, and art galleries. <b>Consider expanding this definition to include similar type businesses/stores that are in between the corners.</b>  | Jim Moore            | No        | Staff TAC discussed on 08-29-22. Decision is to continue to exclude commercial uses from the R Districts except corner stores as currently proposed.   |
| Article 23 | developable land         | Land that is suitable as a location for structures. <b>Consider revising this to be consistent with the description in the LDR.</b>   | Jim Moore            | Yes       | Deleted definition of "developable land."  |
| Article 23 | Dwelling-Single Family   | · <b>Dwelling, Single-Family:</b> A residential building containing only one dwelling unit and not occupied by more than one family. <b>There are several single family houses with more than one family in them in zoned areas of the County Consider updating this definition to reflect a dwelling unit intended to be occupied by one family.</b>   | Jim Moore            | Yes       | Staff TAC discussed on 08-08-2022. Decision is to move away from defining dwelling types by "family." Deleted definition of "single-family dwelling."  |
| Article 23 | Engineer of Record       | · <b>Engineer of Record: Please correct the typographical area and move the term, Equipment Sales and Rental: to a separate definition</b>  | Jim Moore            | Yes       | Corrected typo.  |
| Article 23 | Farm Animals             | · <b>Farm Animals:</b> Animals that are specifically kept or raised, including cattle, livestock, poultry or fowl commonly used for pleasure or marketed in agricultural operations. <b>Consider revising this definition to be Livestock and to be more inclusive to include exotic as well as non-typical live animals. E.g. guineas, goats, bison, sheep, rabbits, emus, lamas, equine such as horses, donkeys and mules, etc.</b>   | Jim Moore            | Yes       | Revised generally as suggested. Added the referenced animals, except equines. Staff TAC advised to keep chickens and equines separate from "farm animals."   |

| Article    | Page Number                 | Comment   | Name (If applicable) | Revision? | Response / Resolution  |
|------------|-----------------------------|---|----------------------|-----------|--|
| Article 23 | Farm Labor Dwelling         | <p><b>Farm Labor Dwelling:</b> Single-family dwelling located on and used in direct connection with a farm, or where the agricultural activity provides income to the occupant(s) of the dwelling. A farm dwelling includes employee housing for that farm.</p> <p><b>Consider revising this definition as follows to reflect some of the existing Farm Labor Dwellings in the county. "Farm Labor Dwelling: Single-family dwelling located on and used in direct connection with a farm, or where the agricultural activity does or does not provide income to the occupant(s) of the dwelling. A farm dwelling includes employee housing for that farm."</b></p>  | Jim Moore            | Yes       | Revised per Staff TAC input, which aligns with the stakeholder comment. The County recently added this definition to the Zoning Ordinance. Staff TAC discussed on 08-08-2022. Decision is to clarify that "farm labor dwellings" are used by one or more individuals that support the daily operation of the principal agricultural use (not necessarily tie to receiving income). |
| Article 23 | New Definition              | <p><b>"Grandfathering Zoned Property":</b> There has been considerable debate among staff as to what this means. Staff over the last six years has said that Grandfathering no longer exists when the property is sold, some say it remains when the property is sold. Others say there is a time limit if the non-conforming Use is stopped temporarily. It is recommended that the definition state that Illegal/nonconforming property Uses that exist when the property is zoned, those Uses may continue on the property even if the property is sold or the zoning is changed.</p>  | Jim Moore            | Yes       | Clarified in Article 19: Nonconformities & Vested Rights. Added entry (in Article 21) for "grandfathered" and simply cross-referenced the nonconforming definitions.   |
| Article 23 | Horses in Residential Zones | <p><b>Horses in Residential Zones:</b> Keeping and raising of horses for private use only. This does not include boarding of horses. <b>Consider deleting this definition because there are many residential zoned properties where horses, donkeys and mules are kept for private as well as commercial use and boarding in the county.</b></p>  | Jim Moore            | Yes       | Revised as suggested. This was a carry over from the current Zoning Ordinance, but the use was eliminated from the use table. Removed definition. Added "equine stables" to use table as a replacement.  |
| Article 23 | New Definition              | <p><b>Consider adding a definition for Horse. It is recommended that this definition be broad enough to include mules and donkeys e.g. Equine.</b></p>  | Jim Moore            | Yes       | Revised as suggested. Added definition of "equine." Added entry for "horse," with a cross-reference to "equine."   |
| Article 23 | Illegal Use                 | <p><b>Illegal Use:</b> Those uses that are illegally established in a particular zoning district in which the use may not be conducted, and was established after the inception of zoning for that particular parcel of land. <b>Consider confirming this definition is consistent with providing property to a family member that is less than the required area for the zoning district. This item was debated within the County Staff when the properties were zoned in 2018 and no clear answer was provided. Please define inception. Is it when the zoning was approved or when the zoning process is started? This time period can be over two years. It is recommended that "inception" is changed to "approval."</b></p> | Jim Moore            | Yes       | Revised definition of "illegal use." Also adjusted language related to illegal uses in 19.1.2: Applicability (Nonconformities article).  |
| Article 23 | Industrial Heavy            | <p><b>Industrial, Heavy:</b> An establishment that has the potential to be dangerous or extremely obnoxious. Examples include uses where explosives are stored, petroleum is refined, natural and liquid gas and other petroleum derivatives are stored and/or distributed in bulk, radioactive materials are compounded, pesticides and certain acids are manufactured, natural resources are mined or quarried, and hazardous waste is treated or stored as the establishment's principal activity. <b>Consider adding chemical processes and manufacturing as well as metal fabrication to this definition.</b></p>  | Jim Moore            | Yes       | Revised as suggested.  |
| Article 23 | livestock                   | <p><b>Consider addition a definition for Livestock. It might be merged with Farm Animals. It should be broad enough to include exotic and non-traditional farm animals. e.g. Goats, guineas, fowl including chickens, bison, lamas, rabbits, emus as well as cows, pigs, sheep etc. All of these animals exist or recently existed in residential zoned areas of the County</b></p>   | Jim Moore            | Yes       | Revised as suggested. Merged definitions of "livestock" and "farm animals," and added the referenced examples.   |
| Article 23 | Lot, Double Frontage        | combine multiple definitions into one.  | Jim Moore            | Yes       | Revised per Staff TAC input. The intent was to resolve the conflicting definitions.  |
| Article 23 | Manufactured home park      | Two definitions - consider combining  | Jim Moore            | Yes       | Revised to align with statutory definition. One definition is for multi-section MH, the other is for single-section MH. The two definitions are needed (see Article 4: Use Regulations for Zoned & Unzoned Areas). Revised to align with the SC statutory definition of "manufactured home."   |



| Article    | Page Number                 | Comment  | Name (If applicable) | Revision? | Response / Resolution   |
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| Article 23 | non-conforming structure    | · <b>Nonconforming Structure:</b> A structure that existed lawfully on the date this Zoning Ordinance became effective and which does not conform with the permitted uses for the zoning district in which it is situated. Nonconforming uses are incompatible with permitted uses in the districts involved. Such nonconformities are permitted to continue until they are removed or vacated. <b>Consider also using the term "Grandfathered Property" in the name of this term.</b>                       | Jim Moore            | Yes       | Added entry (in Article 21: Definitions & Acronyms) for "grandfathered" and simply cross-referenced the nonconforming definitions.  |
| Article 23 | Open Space                  | Two - Combine and add that it will be maintained.  | Jim Moore            | Yes       | Resolved duplicate definitions. The open space section in Article 11: Subdivisions & Group Developments requires maintenance of open space in perpetuity.   |
| Article 23 | Parking Facility            | · <b>Consider combining the definitions of Parking Facility (Indoor/Outdoor) and Parking Lot:</b>  | Jim Moore            | No        | Staff TAC discussed. Decision is to keep both definitions, as "parking facility" is a specific land use (principal use) and "parking lot" refers to any parking area.   |
| Article 23 | Passenger Transport Station | · <b>Passenger Transportation Station or Terminal:</b> A facility used for the purposes of providing regular, continuing shared-ride surface transportation services to the public. Passenger transportation stations include bus terminals, subway terminals, taxi stands, trolley and cable car terminals, and railroad terminals. <b>Consider adding airport terminals to this e.g. Greenville Downtown Airport and Donaldson Airport. There are passengers that regularly depart and arrive at both.</b> | Jim Moore            | Yes       | Revised as suggested.   |
| Article 23 | Pharmacy                    | · <b>Pharmacy:</b> An establishment primarily engaged in preparing and dispensing prescription medications. <b>For clarity, consider adding "Drug Store" to this term</b>  | Jim Moore            | Yes       | Revised as suggested. Added. Also added an entry for "drug store" with a cross-reference to "pharmacy."   |
| Article 23 | portable storage unit       | · <b>Portable Storage Unit:</b> Any container designed for the temporary storage of personal or business property and that is delivered and removed by truck. <b>Consider including the words "and trailer" after the word "truck."</b>  | Jim Moore            | Yes       | Revised generally as suggested. "And" might be too limiting, so added "and/or" trailer.   |
| Article 23 | Preliminary Plan            | · <b>Preliminary Plan:</b> A tentative plan showing a proposed subdivision design submitted to the Planning Commission for preliminary consideration and approval. <b>Consider also adding to this definition that the Plan shall meet all regulations and where a regulation cannot be met provides for a request for variance.</b>   | Jim Moore            | Yes       | Preliminary Plan procedure includes approval criteria that specify the plan must meet UDO standards.  |
| Article 23 | Public Utility              | · <b>There are two definitions for Public Utility. Need to combine them into one.</b>  | Jim Moore            | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.   |
| Article 23 | riding academy              | · <b>Riding Academy:</b> Consider making the following revision. Land used for the purpose of giving instruction or offering classes, whether public or private, on horsemanship. This use may also include the boarding <b>(indoor/outdoor) of equine animals</b> on-site.  | Jim Moore            | Yes       | Revised generally as suggested. Added "equine stables" to use table as a replacement for "horses in residential zones." Defined "equine stables" to include areas for boarding, training, and riding. Renamed "riding academies" as "equestrian centers" and significantly expanded the use definition. |
| Article 23 | Sale/service of ag equip    | · <b>Sales/Service of Agricultural Equipment:</b> Consider making the following revisions to the definition: This use includes establishments primarily engaged in retail sales of new <b>and used</b> outdoor power equipment designed for agricultural use, and may include related activities, such as repair services and sales of replacement parts.  | Jim Moore            | Yes       | Revised as suggested.   |
| Article 23 | Seasonal Lighting           | <b>remove underline from definition</b>  | Jim Moore            | Yes       | Corrected typo.   |
| Article 23 | specialty trade contractor  | · <b>Please remove and place the term Stadium and its definition separately from the term and definition for Specialty Trade Contractor, General Contractor, Homebuilder</b>   | Jim Moore            | Yes       | Corrected typo.   |
| Article 23 | street                      | · <b>There are two definitions for Street. Need to combine them into one.</b>  | Jim Moore            | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.   |
| Article 23 | structure                   | · <b>There are two definitions for Structure. Need to combine them into one.</b>   | Jim Moore            | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.   |
| Article 23 | subdivision                 | <b>There are two definitions for Subdivision. Need to combine them into one.</b>   | Jim Moore            | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.   |
| Article 23 | theater - drive in          | · <b>Consider revising Theater, Drive-In: to the following.</b> A facility where motion pictures are displayed for viewing by patrons who remain in their cars <b>or outdoors</b> for an admission fee and may include food and beverage service.  | Jim Moore            | Yes       | Revised as suggested.   |
| Article 23 | Tiny house                  | <b>Add definition</b>  | Jim Moore            | Yes       | Revised as suggested. Added definition of "tiny house."   |

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| Article 23   | condominium         | · <b>Consider combining the term Townhouse and its definition with the term Condominium.</b>  | Jim Moore                  | No        | No changes made. "Condominium" is an ownership structure, while "townhouse" is a dwelling type. A townhouse dwelling can be located on an individual, fee simple lot; or can be part of a horizontal property regime (i.e., a condo).  |
| Article 23   | tract               | · <b>There are two definitions for Tract. Need to combine them into one.</b>  | Jim Moore                  | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.  |
| Article 23   | use temporary       | · <b>Consider removing the underline of the definition for Use, Temporary:</b>  | Jim Moore                  | Yes       | Corrected typo.  |
| Article 23   | variance            | · <b>Please consider the LDR definition of Variance: and its requirements in this definition.</b>   | Jim Moore                  | No        | We believe this comment refers to LDR Section 1.6.3. Variances, which authorizes the Planning Commission to approve variances. However, the SC Planning Act defines "variance" only in the context of zoning regulations and authorizes the BZA to approve. Article 17: Land Development Procedures will authorize the PC to approve "waivers" from subdivision/land development regulations, and will carry forward the current standards in LDR 1.6.3. |
| Article 23   | veterinary hospital | · <b>Please consider the following revisions to Veterinary Hospital:</b> An indoor or outdoor facility <b>for the treatment and boarding of animals</b> that may contain outdoor kennels used for treatment of all animals.   | Jim Moore                  | Yes       | Revised generally as suggested. Added proposed text, but deleted last portion of sentence ("used for treatment of all animal") as it seemed redundant with the addition.   |
| Article 23   | wetlands            | · <b>There are two definitions for Wetlands: It is recommended that one is chosen.</b>  | Jim Moore                  | Yes       | The intent was to resolve the conflicting definitions. Revised per Staff TAC input.  |
| Article 23   | zoning district     | · <b>Correct the definition for Zoning District to reflect that of Greenville County not York County.</b>   | Jim Moore                  | Yes       | Corrected typo.  |
|              |                     | · <b>Consider a use such as spraying sewage sludge on fields - permitted in ag, R-R3, R-R1, and R-S</b>   | Jim Moore                  | No        | No changes made. This is regulated by SCDHEC (now SCDES).  |
|              |                     | A process for reverting back to original zoning should be included in case a site plan is denied (like Roberts farm). It can be as simple as a condition in the zoning ordinance after a period of time if a site plan is not approved.   | Michael Dey                | No        | No changes. Rezoning or "reverting" back to a previous district requires action by County Council.   |
| Introductory |                     | Does not include a housing statement. To have a sound economy with successful economic development, housing is a vital component of recruiting new business and industry and creating new jobs. Housing should be included as a statement of objective  | Michael Dey                | No        | No changes. Purpose statement already includes provision re: housing. Section 1.2.B.18 states that one of the purposes of the UDO is to: "Accommodate a variety of housing types that is affordable for the County's entire spectrum of households."   |
|              | ADU                 | The 2-acre minimum lot size is much too large for an accessory dwelling unit in a separate building. The minimum lot size should be no larger than 1/2 acre, and can be even smaller than that. In addition, the doubling of the lot area over the underlying zoning is unnecessary as well.            | Michael Dey                | Yes       | Staff TAC discussed on 09-12-22. Decision is to revise to allow detached ADUs in R-S and more restrictive districts and eliminate the provision twice the district lot area.   |
|              |                     | The parking standard is too large as well. One parking space per bedroom is much too large and will contribute to impervious surface when the marketplace is trending away from the need for large off-street parking areas.  | Michael Dey                | Yes       | Staff TAC discussed on 09-12-22. Decision is to require one space per ADU. Revised per Staff TAC input.  |
|              |                     | We seem to be seeing a continuation of the trend from Greenville County of making middle housing difficult, if not impossible, to provide in the marketplace. And yet the marketplace is speaking loudly that it wants middle housing   | Michael Dey                | No        | This is good to know, but specifics would be helpful. Which UDO provisions make middle housing more difficult to produce? Staff TAC discussed on 08-29-22. Agreed we need more information, but noted the concern may relate to townhouses more so than triplexes, quadplexes, etc.  |
| Introduction | 6                   | Related to Table 1.4-1: Applicability of UDO Articles to Zoned and Un-zoned Areas, if the process for initial zoning will be outlined in "Article 16: Zoning Procedures", that article should apply to unzoned areas as well.   | Lisa Hallo/Upstate Forever | Yes       | Consolidated all procedures into one article. The initial concern was ensuring compliance with the SC Planning Act, which we were able to accomplish with one procedures article.  |
|              | 6                   | Revise 1.5.b as follows with edits in red: "Any amendments to this Ordinance, including any rezoning <b>or initial zoning</b> approved pursuant to Article 16: Zoning Procedures, shall be made in accordance with the adopted Comprehensive Plan in effect at the time of such request for amendment." | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested.  |
|              | 6                   | "AG" seems out of place at the top of the list (or as the most restrictive). At the very least, ESD-PM should be considered more restrictive than AG, given the number of uses allowed in AG as compared to ESD-PM.   | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 09-12-22. Decision is to make AG the least restrictive district due to the function of this hierarchy (Staff uses this for rezonings. If someone proposes R-20A and gets denied, can only come back within 6 months with a request for R-S or lower). Revised per Staff TAC input.  |

| Article | Page Number | Comment  | Name (If applicable)       | Revision? | Response / Resolution   |
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|         | 13          | Under Purpose for Rural Residential Districts (R-R3 and R-R1), integrate language from the Rural and Rural Living place type. For example, consider revising bullet #1 with edits in red: "Provide a low-density housing option in areas that are rural in character and integrate well with the natural landscape and agricultural uses."   | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested.   |
|         | 15          | Under Location for Suburban Residential District (R-S), revise bullet #1 with edits in red: "Is generally appropriate in areas designated as Suburban Edge or Suburban Neighborhood on the Comprehensive Plan Future Land Use Map" and #2 –"May be appropriate in areas designated as Rural or Rural Living Corridor on the Comprehensive Plan Future Land Use Map". Note: Suburban Neighborhood place types call for 3-5 du/a (far more intense than R-S allows). On the other hand, Rural and Rural Living place types are characterized by much lower density than R-S allows. While "Rural Corridor" also calls for lower densities, it is described as connecting denser suburban areas with rural areas and may be an appropriate location for consideration of R-S. | Lisa Hallo/Upstate Forever | Yes       | In looking at the Future Land Use Map, it does seem the areas designated as Rural and Rural Living are not appropriate for R-S. Agreed that Rural Corridor may be appropriate for R-S. I think it's fine to suggest R-S is appropriate in Suburban Neighborhood--there are some areas designated as Suburban on the FLU Map that seem appropriate for R-S. Revised 2.3.4.B.2. to include only Rural Corridor. |
|         | 17          | Under Single-Family Residential Districts, revise bullet #1 under Purpose with suggested edits in red: o "The Single-Family Residential Districts are established as areas in which the principal use of land is for detached single-family residential dwellings, including single-detached, single-attached, and duplexes and for related recreational, religious, and educational facilities normally required to provide an orderly and attractive residential area."  | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 08-08-22. Decision is to move away from defining dwelling types by family. As such, revised this section generally as suggested.   |
|         | 20          | Under Mixed Residential District Pg. 20 –Revise Purpose with suggested edits in red: "The Mixed Residential Districts are established to provide for varying population densities and expand housing choices for residents. The principal use of land is for one-family, two-family, and multiple-family dwellings residential dwelling types including single-detached, single-attached, duplexes, triplexes, quadplexes, and multiplexes and recreational, religious, and educational facilities normally associated with residential development".  | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 08-08-22. Decision is to move away from defining dwelling types by family. As such, revised this section generally as suggested.   |
|         | 21          | Ensure that maximum densities will not unintentionally limit housing types that can be built in Mixed Residential Districts. For instance, will current density maximums allow for dwelling types other than single-attached, single-detached, and duplexes in any Mixed Residential Districts other than R-MA and R-M20?  | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 08-29-22. Decision is to relocate density to Subdivision Article since it only applies in an open space (cluster) subdivision. In other situations, minimum lot area will control. Clarified that density only applies to multiplexes, apartment complexes, and other group developments.  |
|         | 22          | In Table 2.3.6-3, it is good to see duplex, triplex, and quadplex dwellings (often appropriate for smaller, infill lots) regulated differently than "multi-family" (often on larger lots). Consider the edits below to Table 2.3.6-3: o Rename "Multi-Family Dwelling or Use" to "Multiplex".  | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested. Renamed "multi-family dwelling" as "multiplex dwelling" as suggested. Also added definition of "apartment complex."   |
|         |             | For dwelling types meant to be house-scale including single-detached, single-attached, duplex, triplex, and quadplex, reduce max heights to 35' and no more than 2.5 stories. Also consider adding a max width for these dwelling types. Note: Specifying a maximum number of stories, reducing the height max to 35', and considering a max building width will ensure these dwelling types meant to be house scale are built as such, versus dramatically out of scale with surrounding neighborhood dwellings.  | Lisa Hallo/Upstate Forever | No        | Staff TAC discussed on 08-29-22. Decision is to maintain current height limits due to concern with potential for nonconformities and to not regulate building width.  |
|         |             | Consider increasing the max height for "Multi-Family" and "Buildings and Non-Residential Uses & Structures" beyond 45' and/or allow for height bonuses to incentivize affordable housing.  | Lisa Hallo/Upstate Forever | Yes       | Revised generally as suggested. Staff TAC discussed on 08-29-22. Decision was to increase height to 55 ft for apartment complexes, mixed use buildings, and care homes. However, we ultimately ended up adding increased height as an affordable housing incentive, rather than increasing height for certain building types in the Mixed Residential Districts.  |

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|         | 34          | Under Commercial Districts Purpose statements: Revise for C-1 with edits in red: The C-1 District is established to provide commercial establishments for the convenience of local residents traveling by foot, bicycle, transit, and motor vehicle. o Revise the first line of C-2 and C-3 with edits in red: The C-2 (or C-3) District is established to provide for the development on major thoroughfares or in commercial hubs of commercial land uses that are oriented to customers traveling by automobile, foot, bicycle, transit, and motor vehicle.   | Lisa Hallo/Upstate Forever | Yes       | Revised generally as suggested. Revised C-1 and C-2 purpose statements as suggested. The proposed revision for C-3 seemed inconsistent with the intent of the district.   |
|         | 35          | Consider increasing maximum densities for C-1, C-2, and C-3 (or at least C-2 and C-3). The character areas in the FLU Map where these C Districts are suggested call for much higher densities. Note: The comp plan character areas listed as "generally appropriate" for C-1, C-2, and C-3 call for development designed to serve multiple travel modes (i.e. Suburban Commercial Center (6-12 du/ac), Suburban Mixed Use (6-20 du/ac), Mixed Use Neighborhood (20-40 du/c), Urban Core (40-80 du/ac), Transitional Corridor (12-30 du/a), Mixed Use Corridor (12-40 du/a), and Transit Corridor (20-40 du/ac). | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 08-29-22. Decision is to increase density in C-2 and C-3 from 20 to 40 du/ac. Revised per Staff TAC input.   |
|         | 10          | Permit "Backyard Chickens" in R-20A.   | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised as suggested.   |
|         | 11          | Permit "Livestock" in R-R1, R-R3, and R-S. Note: See below for recommended definition of Livestock.  | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested. Revised use table to allow "Farm Animals, Livestock, Barns and Stables" as allowed in the current Zoning Ordinance (permitted in R-R3, R-R1, R-S; conditional in R-20A). Revised definition for "farm animals." Added an entry for "livestock" and simply cross-referenced the "farm animals" definition.                     |
|         | 12          | Permit "Agricultural/Horticultural Production, Indoor and Outdoor" in R-20A.   | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised as suggested.   |
|         | 13          | Permit "Community Gardens, Non-Commercial" and "Farmstands (permanent)" in R-R1, R-R3, and R-S.  | Lisa Hallo/Upstate Forever | Yes       | Revised generally as suggested. Community gardens already allowed as a conditional use in all districts (except AG, where they're permitted). Added farmstands (permanent) in R-R3, R-R1, and R-S. Also added conditions for farmstands (in all districts) related to safe vehicular ingress and egress.  |
|         | 15          | Allow "Art Galleries, Artisan Workshops, or Studios" as Conditional (C) in most districts.   | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 09-12-22. Decision is to allow in AG and O-D. In residential districts, artisan studios and workshops (without on-site retail sales) are already allowed as a home occupation. Revised per Staff TAC input. Final Draft UDO separates this into two uses, allows art galleries in more districts, and removes use condition. |
|         | 18          | Permit "Riding Academies" in R-R1, R-R3, and R-S.  | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised generally as suggested. Changed "riding academies" to "equestrian centers" and significantly expanded definition. Changed "horses in residential zones" to "equine stables." Definition includes training and boarding. Equine stables allowed in R-R3, R-R1, and R-S (and other districts).                                      |
|         | 18          | Allow "Day Care Centers, Preschools" by Special Exception (SE) in all districts that allow primary/secondary schools and religious facilities as SE.   | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised as suggested, but did not add to AG.  |
|         | 23          | Allow "Mixed Use Buildings" as Conditional in R-M8 -R-M20 and R-6 -R-20.   | Lisa Hallo/Upstate Forever | No        | We feel the use is appropriate in the RM Districts, but probably not the R Districts. Staff TAC discussed on 08-29-22. Decision is to keep as-is, since RM Districts allow the new "corner store" use.  |
|         | 24          | Rename "Corner Store" as "Neighborhood-Scale Retail", allow as Conditional in all residential districts, and expand the types of retail allowed under this "use".  | Lisa Hallo/Upstate Forever | No        | Staff TAC discussed on 08-29-22. Decision is to continue to exclude commercial uses from the R Districts except corner stores as currently proposed.  |
|         | 44          | Rename "Corner Store" as "Neighborhood-Scale Retail" and do not require location at a corner.  | Lisa Hallo/Upstate Forever | No        | Staff TAC discussed on 08-29-22. Decision is to continue to exclude commercial uses from the R Districts except corner stores as currently proposed.  |

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|  | 69-70       | Accessory Dwelling so The purpose of "Accessory Dwellings" is in part to "promote the development of a diverse and affordable housing stock" and to "implement the comprehensive plan". Note 116 states that, "This section significantly expands the use of Accessory Dwelling Units (ADUs) to implement Plan Greenville County...". However, several of the associated requirements make it impractical to build ADUs in most areas (especially in areas close to existing services where more affordable housing stock is most needed and sensible). • Pg. 69 –Under "Limit on Number of Accessory Dwelling Units", specify that ADUs will not impact density calculations for a development or lot. | Lisa Hallo/Upstate Forever | No        | Staff TAC discussed on 09-12-22. Decision is to limit ADUs to one per lot, but not make any revisions related to density.  |
|  | 70          | Delete the "Configuration" section.   | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 09-12-22. Decision is to revise to allow detached ADUs in R-S and more restrictive districts and eliminate the provision twice the district lot area. Revised per Staff TAC input.  |
|  |             | Note: Requiring a 2-acre lot to build a detached ADU (versus an attached ADU) has no logical basis if all setback and other requirements are met.   | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 09-12-22. Decision is to revise to allow detached ADUs in R-S and more restrictive districts and eliminate the provision twice the district lot area. Revised per Staff TAC input.  |
|  | 70          | Under "Required Features" revise Parking Requirement with suggested edits in red: "An accessory dwelling unit must have at least one off-street parking space per bedroom, in addition to the parking spaces required for the principal dwelling unit.  | Lisa Hallo/Upstate Forever | Yes       | Unclear what the requested change is here. Staff TAC discussed ADU parking on 09-12-22. Decision is to revise requirement to one space per ADU. Revised per Staff TAC input.   |
|  |             | Note –There is no requirement for single-detached homes to have at least one parking space per bedroom. ADUs should not be held to a higher standard. Ideally guidance could also be provided as to when no off-street parking would be required.   | Lisa Hallo/Upstate Forever | REVISION  | Staff TAC discussed ADU parking on 09-12-22. Decision is to revise requirement to one space per ADU. Revised per Staff TAC input.  |
|  | 84          | Revise "Livestock in R-20A Zoning District" to simply "Livestock". Additionally: Under "Purpose", change bullet #1 to: "Support agricultural uses in the R-20A District in rural areas to promote economically self-supporting farms." Under "Applicability", change bullet #2 to: "Allowed Districts. This Subsection allows the conditional accessory residential use of raising and keeping livestock as a conditional use subject to the conditions of this subsection in the R-20A District in Districts designated in the Use Table."   | Lisa Hallo/Upstate Forever | No        | "Farm Animals, Livestock, Barns & Stables" is only a conditional use in the R-20A district, so the suggested changes are unnecessary.  |
| Definitions and Acronyms Working Draft(03-07-22) |             | All instances of two or more differing definitions for the same term should be eliminated. It is confusing to have separate definitions applied in the same Unified Development Ordinance (one way in Zoning and another in LDRs).  | Lisa Hallo/Upstate Forever | Yes       | Resolved conflicting definitions.  |
|  |             | Related to the above, do not separate Tree Ordinance definitions, nor Airport definitions, if those are part of the UDO.  | Lisa Hallo/Upstate Forever | Yes       | Airport overlay definitions will remain in the overlay district section, but the tree ordinance definitions are consolidated with other definitions in Article 21.   |
|  |             | A definition is needed for "Livestock". We suggest something along the lines of: "Livestock are domesticated animals raised in a rural or agricultural setting to provide labor, produce commodities, and/or for recreational purposes."  | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested.  |
|  |             | Below are definitions for which we'd suggest specific text edits identified in red. Related notes and/or reasons for recommended edits are in blue. •   | Lisa Hallo/Upstate Forever |           |  |
|  | 5           | Apartment: A dwelling unit that is rented versus owned located in a triplex, quadplex, or multi-family dwelling, or a dwelling located in a mixed-use building.   | Lisa Hallo/Upstate Forever | No        | Zoning cannot regulate ownership vs. rental.   |
|  | 8           | Buffer: An area of undeveloped land that acts as a separation between two land uses of different intensity or that protects water features from pollutants.   | Lisa Hallo/Upstate Forever |           | Revised as suggested.  |
|  | 15          | Dwelling Unit: One or more rooms with a kitchen and toilet facilities used as a place of residence for one family.  | Lisa Hallo/Upstate Forever | No        | This is the same as the proposed definition in Article 21: Definitions & Acronyms.   |
|  |             | Dwelling, Multi-Plex Family: A residential building containing five or more individual dwelling units located on a single lot. See also Use, Multi-Family. Note: Omit the definition for "Use, Multi-Family". It does not seem needed in addition to this definition and will likely cause confusion.   | Lisa Hallo/Upstate Forever | Yes       | Staff TAC discussed on 08-08-22. Decision is to move away from defining dwelling types by family. Staff TAC agreed that "Use, Multi-Family" is the same as a "Group Development" and can be deleted. Changed "multi-family" to "multiplex;" deleted "use, multi-family;" added definition for "apartment complex" (a type of group development). |

| Article | Page Number | Comment  | Name (If applicable)       | Revision? | Response / Resolution  |
|---------|-------------|--|----------------------------|-----------|--|
|         |             | Dwelling, Quadplex: A residential building located on single lot that contains four dwelling units. A quadplex generally has a common outside entrance(s) for all the dwelling units. Note –many quadplexes have multiple outside entrances. It could be added that they share common walls.   | Lisa Hallo/Upstate Forever | Yes       | Revised generally as suggested. Changed from "typically" has a single outside entrance to "often" has...   |
|         |             | Dwelling, Single-Family: A residential building containing only one dwelling unit and not occupied by more than one family. Note: Omit this definition and use the one below.  | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested.  |
|         |             | Dwelling, Single-Family Detached: A single-detached family dwelling unit that is entirely surrounded by open space or yards on the same lot.   | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised generally as suggested, but omitted "single."  |
|         |             | Dwelling, Single-Family Attached: Two or more single-family dwelling units, each with its own outside entrance, which are generally joined together by a common party wall or connecting permanent structures such as breezeways, carports, or garages, whether or not such a group is located on a single lot or on adjoining individual lots. Townhouses are a type of single-family attached dwelling.  | Lisa Hallo/Upstate Forever | No        | Changed term to "townhouse dwelling" as Staff TAC direction is to move away from defining dwelling types by "family."  |
|         |             | Dwelling, Triplex: A residential building located on single lot that contains three dwelling units. A triplex generally has a common outside entrance(s) for all the dwelling units. Note –many triplexes have multiple outside entrances. It could be added that they share common walls.   | Lisa Hallo/Upstate Forever | Yes       | Revised generally as suggested. Changed from "typically" has a single outside entrance to "often" has...   |
|         |             | Dwelling, Zero Lot Line: A single-detached family dwelling that has a zero-foot setback from one side property line. For the purpose of this Ordinance, a zero lot line dwelling shall be treated as a single-family detached dwelling.  | Lisa Hallo/Upstate Forever | Yes       | Revised as suggested. Staff TAC discussed on 08-08-22. Decision is to move away from defining dwelling types by family.  |
|         | 27          | Multi-Dwelling Development: A residential development consisting of three or more dwelling types single-family, two-family or multi-family dwellings located on a parcel or parcels of land, not further subdivided into separate lots, and having yards, courts, or other facilities in common, with shared access easements and governed by a horizontal property regime.  | Lisa Hallo/Upstate Forever | No        | Deleted this definition as it describes a group development.   |
|         | 31          | Planned Residential Development (Formerly Group Residential): A residential development consisting of 3 or more dwelling types single-family, two family, or multi-family dwelling units located on individual lots but having yards, courts, or other facilities in common and governed by an owner’s association.  | Lisa Hallo/Upstate Forever | No        | Deleted this definition as it describes a group development.   |
|         | 36          | Riparian Buffer: A natural or vegetated area adjacent to or bordering a body of water such as a stream, lake, pond, or other water course through which stormwater runoff flows in a diffuse manner so that the runoff does not become channeled and which provides for the infiltration of pollutants while protecting the water body. Note: There are currently two definitions for “Riparian Buffer”. Omit this definition and retain this one: “An area of trees and other vegetation adjacent to a watercourse that forms a transition area between the aquatic and terrestrial environment. The riparian buffer is designed to intercept runoff from upland sources for the purpose of mitigating the effects of nutrients, sediment, organic matter, pesticides, or other pollutants prior to entry into surface waters.. | Lisa Hallo/Upstate Forever | No        | Discussed with Staff TAC. Decision is to keep LDR definition.  |
|         | 42          | Use, Multi-Family: Five or more dwelling units in any configuration (e.g., five single-family dwellings, three single-family dwellings and one duplex, two triplexes and three quadplexes, etc. ) located on a single lot. See also Dwelling, Multi-Family. Note: Omit this definition. It seems unneeded and likely to cause confusion.   | Lisa Hallo/Upstate Forever | Yes       | Complete. Revised as suggested. Staff TAC discussed on 08-08-22. Decision is to move away from defining dwelling types by family. Staff TAC agreed that "Use, Multi-Family" is the same as a "Group Development" and can be deleted. |

| Article                                 | Comment   | Name (if Applicable) | Organization                                     | Date    | Staff Comments / Direction   | Staff Notes                        | Resolution  |
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| <b>Article 5, Parking and Loading</b>   |   |                      |  |         |  |                                    |   |
| 5                                       | <b>Parking minimums.</b> It's excellent that the UDO provides for reductions of up to 25% in parking minimums for certain types of development. However, this reduction doesn't go far enough. The parking minimum should be much lower overall, and developers should be able to reduce parking by at least 50% if transit/pedestrian requirements are met. Consider the dictates of the market: if a developer could (under the UDO) reduce parking by 50%, but knew actual parking needs called for a reduction of only 30%, the developer would be free to add that parking - however, as the proposed UDO currently stands, a developer would not be free to cut wasteful parking beyond the 25% currently proposed. Onerous parking minimums are a main contributor to the increasing cost of new development, and are one of the easiest costs to eliminate - simply stop requiring such high parking minimums. No sane developer would build too little parking; requiring parking simply ensures waste, increasing cost. Parking minimums also contribute to traffic congestion, since they result in buildings that are farther apart, making them less accessible to pedestrians. Few people want to walk across a black asphalt parking lot on a scorching summer day, and even less so as distance increases. Reduce/eliminate parking minimums and allow more shared parking to satisfy parking requirements.   | Jonathan Hallas      |  | 2/23/23 | <b>5.2.4.B. Need meaningful incentives (5 and 10 percent are not enough to warrant the conditions). Allow Zoning Admin. To reduce parking up to 25 percent. Additional reduction up to 50 percent must meet the requirement/conditions in this section (shuttle, transit facility, bicycle, car-sharing, etc.)</b>   |                                    | Increased allowed parking reductions (%) for some of the incentives. Maintained cumulative total for incentives at 25%. Maintained allowance for Zoning Administrator to reduce parking by 25%. Clarified in Administrative Adjustments section that the 25% administrative reduction may be combined with the 25% incentive reduction, for a total reduction of 50%. Maintained provisions for Alternative Parking Plans, which allows reduced parking based on a parking study. |
| <b>Article 6, Buffers and Screening</b> |   |                      |  |         |  |                                    |   |
| 6.3.2 (A)                               | Article 6.3 of the UDO establishes standards for riparian buffers, requiring buffers "along all classes of streams" in accordance with the stormwater management design manual. Article 6.3.2(A) outlines the specific standards for the buffer size depending upon the size of the area the stream drains. See Article 6.3.2(A)(1) (requiring minimum 50-foot riparian buffer for all intermittent, perennial, and blue line streams "draining less than 50 acres"); Article 6.3.2(A)(2) (requiring minimum 100-foot riparian buffer for all intermittent, perennial, and blue line streams "draining 50 acres or more"). SCELP fully supports these standards but suggests a few additions. First, the UDO should define or reference the appropriate standard for calculating the size of the area the stream drains. Eliminating any ambiguity over the size of the area drained by the relevant stream and accordingly whether the required buffer is 50 or 100 feet wide is beneficial in implementing the buffer requirements. The provision clearly establishes the applicable buffer size but lacks clarity regarding the method for determining whether an area drained by a particular stream is more or less than 50 acres. Second, in addition to riparian buffers on all intermittent, perennial, and blue line streams, SCELP urges Greenville County to require a riparian buffer on all waters of the State, as currently required by Article 22.3.5(E) of the Land Development Regulations. As the draft language is currently written, the ordinance does not require a permanent riparian buffer on any waterways beyond "all classes of streams." Extending the riparian buffer requirement beyond only streams serves a critical function in protecting the water quality of the County's waters and maintains consistency with the existing requirement in Article 22. Non-stream waterways—such as wetlands, ponds, and lakes—are all critical to protecting water quality and the County's watersheds. The County's own Riparian Buffer Design and Maintenance Manual emphasizes the importance of riparian buffers for all water bodies, not merely for streams. Protecting only streams will detrimentally impact the water quality of Greenville County, and these regulations must protect all water bodies. | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | <b>LDR 8.22 addresses this and establishes the county's current riparian standards. ----&gt; Please use LDR 8.22 language RE: 6.3.2(A)</b>   | <a href="#">LDR 8.2 Amendments</a> | Added LDR 8.22  |
| 6.3.2(D)                                | Next, Article 6.3.2(D) requires the delineation of all "jurisdictional waters of the United States" or "streams classified as waters of the State "located within the proposed project boundary. This subsection should require the delineation not only of "streams" qualifying as "waters of the State" but any waterway located entirely or partially within the project boundary that satisfies the definition of "waters" or "waters of the State" as adopted by the General Assembly and the South Carolina Department of Health and Environmental Control. See S.C. Reg. § 61-9.122.2(b); S.C. Code Ann. § 48-1-10(2). To ensure the adequate protection of our County's waterways, this language should be revised to require the delineation of all jurisdictional waters of the United States and all waters of the State, not simply a waterway considered a "stream."   | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | <b>LDR 8.22 addresses this and establishes the county's current riparian standards. ----&gt; Please use LDR 8.22 language RE: 6.3.2(A)</b>   | <a href="#">LDR 8.2 Amendments</a> | Added LDR 8.22  |
| 6.3.2(E)(5)                             | Third, Article 6.3.2(E)(5) reduces the minimum riparian buffer to only 40 feet if the "removal of trees" is "a part of silviculture activity." The term "silviculture" is not defined. If "silviculture" is intended to encompass the definition of "forestry and logging activities," SCELP suggests adding the term "silviculture" alongside "forestry and logging activities." More substantively, the presence of this exemption appears to confirm the intent that riparian buffers are not generally required on non-stream waters—the only instance when removal of trees as part of silviculture activity would be permitted with a 40-foot wide riparian buffer is on non-stream waterways because Article 6.3.2(E) makes clear that the wider buffer widths set forth in Article 6.3.2(A) (50 feet and 100 feet wide, respectively) prevail in any conflict. Instead, the 40-foot wide buffer would apply only on waters not otherwise requiring a riparian buffer, i.e., nonstream waters. Furthermore, the absence of a permanent riparian buffer requirement on nonstream waters means a person could conduct either "stumping on agricultural land" or "removal of trees as a part of silviculture activity" and thereafter eliminate the required riparian buffer upon completion of such work, removing the significant benefits riparian buffers provide for water quality.  | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | <b>Please clarify: is this section referring to activities within 40 feet of the riparian buffer or the width the buffer itself.</b><br><br><b>Need a definition for silviculture</b>  |                                    | Clarified the buffer is 40 feet in width (revised to 50 ft per Staff TAC input). Added a definition for silviculture.   |
| 6.3.2(E)(7)                             | Article 6.3.2(E)(7) also illustrates this same problem. Under this subsection, "Clearing of land that has existing lakes, ponds, or jurisdictional wetlands shall only take place outside of a riparian buffer a minimum of 50 feet in width." While this provision mandates a riparian buffer on those non-stream waters during land clearing activities, it leaves those waterways unprotected by a buffer beyond the completion of land clearing. As currently drafted, a developer could maintain a 50-foot riparian buffer while clearing land containing an existing lake, pond, or jurisdictional wetland, but would not be required to maintain a permanent riparian buffer to those waterways once construction of the development is completed. As recognized in Greenville County's own manual, riparian buffers serve several important functions: "successfully filter out pollutants, stabilize the bank, shade the waterbody, and provide habitat for wildlife from microscopic to migratory." Greenville County Riparian Buffer Manual, p. 2. Allowing development—with its increased impervious surface and stormwater runoff—without requiring permanent riparian buffer on all waterways will significantly harm water quality in Greenville County. See id. at 3 ("Riparian buffers are essential for protection of water quality").  | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | <b>Article 6.3.1 should state something along the lines that " Riparian Buffers will be Permanent and will either be in an easement or common area and may be used for post construction water quality if the developer and engineer design it for that it would clear this question up and maybe the others as well that he have.</b><br><br><b>6.3.2 states that Riparian Buffers will be Permanent and will either be in an easement or common area.</b><br><br><b>Add language: "that Riparian Buffers may be used for post-construction water quality if the developer and engineer design it for that and the County engineer agrees."</b> |                                    | Added "Riparian buffers must be protected in perpetuity and may be used for post-construction water quality if the developer and engineer design it for that purpose and the County engineer approves the design." to 6.3.1.A.  |

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| 6.3.2(E)(7) | Additionally, SCELPA urges removal of the word jurisdictional in Article 6.3.2(E)(7). As defined by the UDO, a jurisdictional wetland is only one that satisfies the federal definition adopted by the U.S. Army Corps of Engineers. Greenville County must not narrow its protection of wetlands to only those that meet the federal standard. Instead, Greenville County should protect all "wetlands" as defined in the definitions section. For example, "isolated wetlands" are not considered "jurisdictional" and the Corps lacks any authority to regulate actions affecting them. See Solid Waste Agency of Northern Cook Cnty. v. U.S. Army Corps of Engineers, 531 U.S. 159 (2001) ("SWANCC"). However, isolated wetlands provide the same benefits and serve the same functions as non-isolated wetlands, and therefore still qualify as a "wetland," where the State and the County have the authority to regulate actions affecting them. See Spectre, LLC v. S.C. Dep't of Health and Envtl. Ctrl., 386 S.C. 357, 368 (2010) (holding DHEC had authority over isolated wetlands under the state Coastal Zone Management Act even though the Corps did not have such authority after SWANCC); Georgetown Cnty League of Women Voters v. Smith Land Co., 393 S.C. 350, 352-53 (2011) (holding DHEC has the authority to regulate isolated wetlands under the state Pollution Control Act). As these cases demonstrate, whether a wetland satisfies the federal test to be considered "jurisdictional" is irrelevant to State or local regulatory authority. The UDO should apply to all wetlands, not simply those satisfying federal jurisdiction, and the County must eliminate the word "jurisdictional" from any provision regulating activities affecting wetlands, in particular Article 6.3.2(E)(7) | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | Based on the recent LDR Amendment, riparian buffers will be required for jurisdictional waters and streams classified as waters of the state.   |             | No revision needed.  |
| 6.3.2(E)(8) | SCELP also suggests clarification of Article 6.3.2(E)(8). SCELP supports the increased riparian buffer size when a threatened or endangered plant species is present on the development site, as well as the requirement to prepare a report evaluating "critical areas." However, the term "critical areas" is vague and undefined in the UDO. SCELP therefore suggests defining the term, or instead utilizing the term "critical habitat" as defined and interpreted under the Endangered Species Act. See 16 U.S.C. § 1532(5)(A)(i)-(ii). The required critical area report must assess whether any areas on the development site meet the definition of critical habitat—regardless of whether the U.S. Fish & Wildlife Service has actually designated critical habitat for the particular endangered or threatened species—and outline methods that must be implemented to protect and preserve the natural and ecological features that constitute the critical habitat from any effects caused by activities on site. In addition, the provision should be extended to threatened and endanger animal species whose critical habitat is located on site.   | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | The suggestion to define it by Endangered Species Act would work. I am also now using wording EPA has defined it as "action area" - J. Wortkoetter  |             | Changed term "critical area" to "critical habitat." Added a definition for "critical habitat" that cross-references U.S. Code.   |
| 6.3.2 C     | Finally, the County should clarify the language in Article 6.3.2(C). First, the provision should state that "Riparian buffers must be protected during and post-construction" in all types of development. In addition, the provision should be amended to read, "For individual lots created through the Summary Plat process (Minor Subdivisions), riparian buffers may be located on private lots but must be permanently protected by plat and deed restrictions. In addition, Article 6.3.2(A)(3) and Article 6.3.2(E)(1) have conflicting premises: subsection (A)(3) prohibits the disturbance of existing vegetation within a riparian buffer while subsection (E)(1) suggests riparian buffers are allowed to be disturbed by construction activity so long as the area is re-vegetated using native vegetation. SCELP proposes the County strike subsection (E)(1) and clarify that re-vegetation and maintenance is only permitted as set forth in Article 6.3.3 and 6.3.4.  | Michael G. Martinez  | South Carolina Environmental Law Project (SCELP) | 1/24/23 | Add language where appropriate: "Riparian buffers must be protected during and post-construction."<br><br>Clarify that E(1) is only allowed where buffer disturbance violations have occurred and not for buffers disturbed by construction activity - J. Wortkoetter   |             | Added "Riparian buffers must be protected during and post-construction in all types of development" to 6.3.2.D. (was 6.3.2.C).<br><br>Deleted "by construction activity" from 6.3.2.E.1.   |
| 6           | General comments: it appears that the buffering and screening requirements for Article 22 of the LDRs has been overlooked. Please ensure that these requirements are included in this ordinance. These regulations appear to be focused on suburban and commercial type property uses. Consider that over half of Greenville County is rural and these regulations should consider keeping that character. The ordinance is rather cumbersome to read through and difficult to understand. Consider more use of tables and simplification of the ordinance to be useful. Because of the level of complexity it will be hard to enforce these regulations.   | Jim Moore            |  |         | Article 22 has been replaced with Open Space standards in the Draft UDO Article 6   |             | No revision needed.  |
| 6.1.5 A-C   | 6.1.5 CREDIT FOR EXISTING PLANTS, FENCES, & WALLS<br>A. Generally. The following is consistent with the standards for suburban areas. "An existing fence or wall may be counted towards the buffer requirements of this Section, provided that the fence or wall is structurally sound, in good repair, and of an upright condition." However it is not consistent with the rural areas of the County. A provision should be made that requires a vegetative 50 foot buffer is required for all subdivisions that boarder unzoned, RR-1, RR-3 and Agricultural zoned areas. This is consistent with Article 22 of the Rural Conservation subdivision requirements in the LDRs.<br>C. Existing Fences and Walls- Consider adding a paragraph in this section stating that existing fences, walls, berms or changes in elevation may not be substituted for a 50 foot buffer in the rural areas of the County where a subdivision or commercial or industrial land use is adjacent to unzoned, RR-1, RR-3 and Ag zoned properties.<br>3. "The applicant records an agreement with the County that includes appropriate assurances that if the existing fence or wall deteriorates, or is damaged, destroyed, or removed, the applicant, or subsequent owners of the property, will repair or replace it with a fence or wall that meets the buffer standards of this Article." Consider that this Article is not enforceable. The County does not have the manpower to enforce this regulation nor are HOAs finances enough to cover this cost. It is suggested that another alternative is found for this.   | Jim Moore            |  | 1/9/23  | A. 50 foot buffer would be too much; however, staff is also concerned with the loss of a standard perimeter buffer, as the public expects it.<br><br>We need three (3) Buffer Type: Undisturbed (required when substantial vegetation exists), Planted, and Structured.<br><br>All single family residential developments need some type of buffer, regardless of zoning district/land use, as the public expects it.<br><br>C. Not Applicable<br><br>3. This is a HOA/POA/Civil issue after the subdivision or permit has been closed out. |             | Carried forward the current requirement in LDR 8.21: Forested Natural Vegetative and/or Landscaped Buffer in UDO Article 11: Subdivisions & Group Developments and renamed as "development boundary buffer." The development boundary buffer applies to all new major subdivisions and group developments. |
| 6.3.1       | Applicability should be to all intermittent, perennial, and blue line streams; lakes and ponds; wetlands; and other waters of the state in Greenville County. We suggest removing exclusive reference to the classes of streams in the Greenville Soil and Water Conservation Commission Storm Water Management Design Manual: <a href="https://www.greenvillecounty.org/LandDevelopment/pdf/design_manual/WQ-11_Water_Quality_Stream_Buffer_Spec_2018.pdf">https://www.greenvillecounty.org/LandDevelopment/pdf/design_manual/WQ-11_Water_Quality_Stream_Buffer_Spec_2018.pdf</a> . As it is currently written in the Manual, "streams" is an ambiguous, undefined term. The Manual also refers to the Tree Ordinance, which we understand the UDO is intended to replace. References to these documents is confusing, as they are not in sync with the Article 6.3 specifications for all intermittent, perennial, and blue line streams and for waters other than streams. • It should also be clarified that provisions for riparian buffer protection are intended to apply to all new development and other land disturbance within Greenville County. The terms "perennial stream," "intermittent stream," and "waters of the state" should be defined and included in Article 23 definitions. Furthermore, the definition of a riparian buffer should state the full function of a riparian buffer, not only for water quality protection (filtering pollutants), but also for providing streambank/waterbody stabilization, prevention of erosion and loss of land, prevention of downstream sedimentation, floodwater storage and groundwater infiltration, shade and moderation of water temperatures, support of ecologically valuable plant communities, and fish and wildlife habitat.                    | Melanie Ruhlman      | Save Our Saluda                                  | 1/26/23 | Staff has revised the applicability definition to meet the State of South Carolina's guidance with respect to wetlands and all classes of streams. Refer to recent LDR Amendment 8.22 (RE: Riparian Buffers applicability)  |             | Carried forward provisions in LDR 8.22 as noted by staff.  |
| 6           | Finally, we suggest adding a section for the allowance of buffer averaging: Buffer averaging may be allowed due to odd, jagged shapes that can make site planning difficult. An applicant may request buffer averaging through the variance process if the width reduction will not inhibit and degrade stream and habitat functions. The buffer width reduction is not more than 25% of the standard buffer and the total area of the stream buffer may not be less than through buffer averaging than the standard buffer area. On behalf of the board of directors of Save Our Saluda, that you for your consideration of these comments and questions.  | Melanie Ruhlman      | Save Our Saluda                                  | 1/26/23 | Staff agrees, buffer averaging should be allowed and approved by county stormwater engineers.   |             | Added provisions for buffer averaging in 6.3.2.G.  |



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| 6.3.1 A - 6.3.2 | <p>I appreciate you getting back to me. Based on what you share below, we would like to submit the following thoughts/recommendations for staff's consideration:</p> <p>Extend the application of permanent riparian buffer requirements in 6.3.1(A) to all waters of the state as currently required in unzoned areas under Article 22 and strike the reference to the Storm Water Design Manual. As currently written, Article 6 requires permanent riparian buffers only on streams, but not wetlands, ponds, and lakes -- all of which are critical to protecting water quality. If riparian buffer requirements are not extended to all waters of the state, many benefits derived through expanded protections for streams will likely be lost due to negative impacts to other unprotected waters. Additionally, we recommend striking the reference to the Storm Water Design Manual, as that may imply buffers are only required if they are to be used for stormwater control. We suggest these specific edits:</p> <p>6.3.1 A: Applicability. Riparian buffers shall be provided along all classes of streams waters of the state for all new development and other land disturbing activities within Greenville County as described herein. in accordance with the Greenville County Soil and Water Conservation Commission Storm Water Management Design Manual. Strike the reference to additional manuals and specifications in 6.3.1(C). Referring to additional manuals and specifications, unless those manuals are updated concurrently to match the exact specifications and verbiage used in the updated UDO could result in contradictions and confusion. Specifically, referring to the Storm Water Design Manual, as mentioned above, may imply that riparian buffers are only required if they are to be used for stormwater control.</p> <p>Clarify wording in 6.3.2.(C) to reflect the intentions of Article 6. As we understand, the intention of Article 6 is that riparian buffers within Major Subdivisions must be located outside private lots within common or open space. To clarify this point, we recommend re-titling 6.3.2(C) as "Riparian Buffer Protection" (to ensure that sub-bullets apply to all required riparian buffers, not just those protected by easements). We also suggest making the following edits to further clarify this section, especially the point that riparian buffers must be protected during and post-construction, within Major and Minor subdivisions.</p> <p>Riparian Buffer Protection Easements<br/>                     i. Riparian buffer protection during and post-construction. Plat and Deed Restrictions. Riparian buffers must be protected during and post-construction. Preservation of riparian buffers post-construction shall be provided by plat and deed restrictions.<br/>                     ii. Riparian buffers in Major Subdivisions. Location. Any riparian buffers shall be located in common areas only, within residential subdivisions approved by the Planning Commission through the Preliminary Plan process (Major Subdivisions).<br/>                     iii. Riparian buffers in Minor Subdivisions Individual Lots. For individual lots created through the Summary Plat process (Minor Subdivisions), buffers may be located on private lots, but must be permanently protected, preservation of the buffer area shall be by plat and deed restrictions. and must be protected during construction.</p> <p>Clarify wording in 6.3.2.(E) to avoid confusion and vague language. This section, as written, is confusing because the sub-bullet titles listed under the heading of "Standards for Specific Activities" are not actually "activities". Additionally, we'd recommend avoiding vague language such as "in the vicinity" (which in this case is unneeded because specific distances are provided in sub-bullets). We suggest the following edits:<br/>                     Additional Standards. for Specific Activities. The following standards shall apply. to certain specified activities taking place in the vicinity of a body of water that requires a riparian buffer. Where these standards conflict with the riparian buffer widths required in Section 6.3.2.A: Riparian Buffer Widths, above, then the wider buffer width applies.<br/>                     Strike 6.3.2(E)(1), titled "Disturbance". Though we support use of native species in revegetation activities, this lone sub-bullet (with no additional context) seems counter to 6.3.2(A)(3), which specifies that no disturbance may take place within a riparian buffer. Additionally, this bullet is unneeded given the entire 6.3.3 Revegetation section, which provides context by specifying criteria for when such Revegetation would be allowed and necessary.</p> <p>Strike "jurisdictional" from 6.3.2.(E)(7). This sub-bullet specifies that clearing of land must not take place within 50' of lakes, ponds, or "jurisdictional" wetlands. We recommend striking "jurisdictional" and expanding protections to all wetlands. The importance of wetlands protection via buffers for water quality in Greenville County extends well beyond those considered "jurisdictional".<br/>                     Finally, in 6.3.2(E)(8), we suggest avoiding the term "critical areas" and instead using "critical habitat". "Critical area" is not defined in the UDO, however, "critical habitat" is defined as "areas vital to the survival of endangered or threatened species" in the listed definition for Endangered Species Act.</p> | Lisa Hallo           | Upstate Forever |      | <p><b>Developers must protect Riparian Buffers regardless of whether they are used to meet stormwater management requirements.</b></p> <p><b>Rename 6.3.2.C Riparian Buffer Protection</b></p> <p><b>Staff would like to have a conversation about 6.3.2. C. &amp; 6.3.2. E</b></p> | <p>Needs more clarity about the activities that require a setback essentially from the buffer.</p> | <p>Added 6.3.1.A.2 and 6.3.2.D (was C) that riparian buffers must be protected in perpetuity.</p> <p>Renamed 6.3.2.D (was C) as Riparian Buffer Protection.</p> <p>Discussed 6.3.2.C (now D) and 6.3.2.E with Staff TAC on 03-25-24.</p> |

**Article 8, Outdoor Lighting**

|   |  |             |  |        |   |  |   |
|---|--|-------------|--|--------|---|--|---|
| 8 | <p>In June 2020, I submitted general suggestions for the UDO including the requirement for shielded lighting to minimize light pollution. I am very disappointed to see what is proposed in Article 8. It seems little time and research have been expended on outdoor lighting. As currently drafted, residential (detached house dwellings, duplexes, triplexes, quadplexes, townhouses, and manufactured homes) and street lighting are exempt from the requirements of new Article 8. Bare-bulb street lights are harming wildlife, diminishing night skies and intruding on the peace and enjoyment of neighboring properties, particularly in the un-zoned and more rural areas of the county. Here is an example of very intrusive street lighting at Hillside Plantation (Bolero Ln and Fancy Ln) two miles outside the city limits of Travelers Rest. (attachment) International Dark Sky Association is the recognized authority on light pollution and is the leading organization combating light pollution worldwide. Their website offers ten ideas of Value-Centered Outdoor Lighting. I respectfully request White &amp; Smith reference guidance by the recognized authority and take a more responsible stab at the requirements for outdoor lighting in Greenville County, with emphasis in/near un-zoned, rural and protected areas.</p> | Gindy Clark |  | 4/8/23 | <p><b>We should not regulate lighting on SF Detached private property; however, we may need to provide standards for SF Detached subdivision street lighting IF provided</b></p> <p><b>We need to add Townhome developments to these new lighting requirements, as they were formerly considered "group developments"</b></p> |  | <p>Revised to require streetlighting for townhouse subdivisions. Specifies that streetlighting is optional in other subdivision types but, where provided, all streetlights must be fully shielded LED. Added a cross-ref in Section 11.13: Townhouse Subdivisions. Added definitions of "lamp," "luminaire," and "fully shielded luminaire."</p> |
|---|--|-------------|--|--------|---|--|---|

**Article 9, Building Design**

No comments

**Article 13, Transportation Corridor Preservation**

No comments

| Article                             | Page # | Comment  | Name           | Organization            | Date    | Staff Comment   | Response / Resolution   |
|-------------------------------------|--------|--|----------------|-------------------------|---------|---|---|
| <b>Article 7, Tree Preservation</b> |        |  |                |                         |         |   |   |
| 7                                   |        | GHF is in support of Article 7: Tree Preservation as part of the Unified Development Ordinance and its goal of increasing quality of life for Greenville County through the preservation of our tree canopy. This not only supports our Comprehensive Plan but also creatively addresses protecting our remaining canopy through tree save areas. Our concern lies in the impact of a fee in lieu of for affordable projects. We had similar issues with the City of Greenville's initial tree bank, which has now been adjusted, to allow for affordable projects to not be subject to a fee in lieu as well as having use of the tree bank for planting to meet tree requirements. Without this adjustment projects were paying fees upward of \$100,000-\$300,000 on a development, undermining the affordability of the project. We believe both priorities can be in balance with each other if these small changes are made. | Tina Belge     | Greenville Housing Fund | 9/29/23 | <b>Exemptions should be made for affordable housing projects (Re: Fee in Lieu). A waiver should be required for any exemption from planting/protection requirements of Article 7</b>  | The fee-in-lieu was removed from the final draft, and significantly reduces the tree preservation requirements. Impacts on affordability should be reduced in the final draft.  |
| 7.1.3.B                             |        | Applicability. 8. Exemptions (insert) 3. Affordable Housing Developments (Rental- 20% or more affordable homes serving 80% AMI or below, Homeownership- 10% or more affordable homes 100% AMI or below)- this can be altered to best fit with affordable homeownership incentives.   | Tina Belge     | Greenville Housing Fund | 9/29/23 | <b>Exemption should apply only to homeownership. Should align with the affordable housing incentives currently being developed by Planning and GCRA</b>   | Staff Technical Advisory Committee discussed affordability and decided instead to reduce the overall requirements for preservation instead of an exemption. Impacts on affordability should be reduced in the final draft.  |
| 7.1.13.A.5.                         |        | Greenville County Tree Bank Established. A. 5. (Insert) Ensure Tree Canopy is preserved for affordable housing projects by allowing tree bank funds to be utilized for plantings for affordable housing developments (see definition above).   | Tina Belge     | Greenville Housing Fund | 9/29/23 | <b>Affordable housing projects meeting the county's criteria should be eligible to apply for Tree Bank funding to meeting Article 7 requirements</b>  | The fee-in-lieu was removed from the final draft based on the overall changes to remove the tree save area requirements, so there will not be a tree bank.  |
| 7.1.14                              |        | Fee-In-Lieu of Compliance. We believe that it should be easier to meet the goals of this ordinance than it is to pay FILOs. Costs should be incentivized to make developers want to meet the requirements in this Article. The City of Greenville's current development code (19-6.3.3) should NOT be used as a model regarding FILOs. <i>Recommendation:</i> Ensure that FILOs are set at a high enough rate to ensure that developers are properly incentivized and motivated to meet the requirements in this Article. For example, a specimen tree that is removed shall be assessed with a FILO of \$100 per inch DBH.  | Tina Belge     | Greenville Housing Fund | 9/29/23 | <b>Staff agrees, fees should be high enough to discourage tree removal/FILO</b>   | The entire incentive structure was changed based on subsequent discussions with the Staff Technical Advisory Committee. Compliance costs will be very similar to the current program, which has been carried forward with some adjustments.   |
| 7                                   |        | On another note we are grateful for staff and consultants changes to the previous Module 1 ADU provisions, removing the two acre minimum requirement however we encourage a wide scope of zoning districts being allowed detached adus as attached is much harder to come across in our region, more expensive to build, and often not attractive to homeowners to build as a lack of distance or space from the ADU to the primary residence. Additionally, we need to be driving density to more urbanized areas, some key examples would be our former mill village areas. We ask that this be revisited before final adoption.   | Tina Belge     | Greenville Housing Fund | 9/29/23 | <b>ADU must meet minimum setback of district or 5 foot minimum if no setback is required. Article 3.4.5 C. should explicitly reference ADU conditions/requirements in ALL residential zoning districts. Article 3.4.5 C. 3. b. should not prohibit detached ADU's in referenced residential district; Detached ADU's should be permitted in all residential zoning districts.</b> | No revisions needed in Article 7.   |
| 7                                   |        | Overall this draft is an improvement to the current tree ordinance. However, there are not enough financial incentives for developers and builders that offset the costs associated with true tree preservation. Tree preservation is expensive. Why would someone do it if it's cheaper to write a check? As cross section of industry professionals we agree that it should not cost more to do true tree preservation. We have a great example with the City of Greenville's current maximum fee of \$25,000. That's a lot less expensive than engaging an arborist to do tree preservation. As mitigation fees are calculated we support tree preservation costs being toggled so there is a financial incentive to get that investment in trees back through the mitigation calculator tool   | Joelle Teachey | Trees Upstate           | 9/23/23 | <b>Staff agrees, fees should be high enough to discourage tree removal/FILO</b>   | The entire incentive structure was changed based on subsequent discussions with the Staff Technical Advisory Committee. Compliance costs will be very similar to the current program, which has been carried forward with some adjustments. Some preservation is required with 10% of TDU credits coming from preserved trees. The revisions add an incentive of a 10% density bonus if 50% of TDUs are accounted for from preserved trees. |
| 7                                   |        | Surveyors should only do the inventory, locate and base map. ISA Certified Arborists should do Tree ID and health assessments. Another somewhat recent example from the City of Greenville is a recent mitigation fee that was calculated for removing a stand of oaks. The developer was ready to write a check based on the surveyor's tree ID of oaks. Then an ISA Certified Arborist saw the trees. They were not oaks. It was a stand of tree of heaven. No mitigation fee for that species. In this case, having an ISA Certified Arborist engaged saved money because surveyors are terrible at tree ID. Especially in the winter.  | Joelle Teachey | Trees Upstate           | 9/23/23 | <b>County has the goal of hiring a certified arborist to determine tree health</b>  | No revisions needed.  |
| 7                                   |        | Newly planted trees should be inspected by a Certified Arborist to make sure they are planted properly. There should be enforcement and a correction if they are not installed properly.   | Joelle Teachey | Trees Upstate           | 9/23/23 | <b>County has the goal of hiring a certified arborist to inspect trees. Residential plans shall be reviewed by tree inspector. Commercial plans will be reviewed by zoning, and inspected by building inspectors. However, the county is sufficiently large and staff resources are limited.</b>  | No revisions needed.  |
| 7                                   |        | A developer is paying the same amount of money for land regardless of whether they are building e.g., affordable, workforce, or middle income housing. The tree save area requirements don't include a way for developers to make up for lot loss which is providing the classic anti-tree ordinance argument that it, "hurts affordable." It does. We recommend financial incentives tied to tree preservation and allowing tree bank funds to help with tree costs. For example, if it's 20% affordable housing, there is a toggle in the mitigation fee calculator to offset the costs and there is also the ability for tree bank funds to pay for 20% of the newly planted trees.   | Joelle Teachey | Trees Upstate           | 9/23/23 | <b>Consider incentivizing a tree save area in all projects by offering a density bonus (10 percent?)</b>  | The entire incentive structure was changed based on subsequent discussions with the Staff Technical Advisory Committee. Compliance costs will be very similar to the current program, which has been carried forward with some adjustments. Some preservation is required with 10% of TDU credits coming from preserved trees. The revisions add an incentive of a 10% density bonus if 50% of TDUs are accounted for from preserved trees. |

| Article            | Page # | Comment   | Name           | Organization    | Date    | Staff Comment  | Response / Resolution  |
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| 7.1.3 – C.2        | pg. 5  | As a group we agreed that if we had property we thought we were going to develop in 3-5+ years we'd go ahead and timber it now to start that 5 year clock. Those trees serve Greenville County in place where they are for e.g., stormwater, air quality, soil loss, and land surface temperatures. We need those trees where they are for as long as we can keep them there. We strongly recommend restructuring page 5 7.1.3 – C.2 so it does not promote clearing now and starting that 5 year clock.  | Joelle Teachey | Trees Upstate   | 9/23/23 | <b>How will these timber harvest penalties be administrated/tracked? Is this a questions for Module 3?</b>   | The regulation adopts the strongest regulation possible based on the statutory limits for local government regulation of forestry. No revision was made.   |
| 7.1.9 - 3 (a)      | pg. 17 | Using COG as an example for 1' per 1" is not applicable. COG is infill. County can follow best practice of 1.5' per 1" dbh  | Joelle Teachey | Trees Upstate   | 9/23/23 | <b>Clarify: What is a COG?</b>   | Based on the changes to the overall structure of the ordinance from the draft, the Staff Technical Advisory decided to adopt a more conservative approach on the new root protection zones.  |
| 7.1.6              | pg. 12 | Exclude invasives. Use an exclusion list instead of an inclusion list. Too difficult to list all of the trees. There are large and medium canopy trees missing from this list.  | Joelle Teachey | Trees Upstate   | 9/23/23 | <b>Consider having an exclusionary list of invasive species</b>  | Will add to the UDO Administrative Manual.   |
| 7.1.6              | pg. 12 | Tilia americana a.k.a Basswood a.k.a American Basswood, a.k.a American Linden and the Appalachian Basswood have undergone classification changes. All of these aforementioned are specimen trees. Distinguishing the basswood species and varieties through winter tree ID is difficult and requires very good tree ID (ISA Certified Arborist).  | Joelle Teachey | Trees Upstate   | 9/23/23 | <b>Update list if applicable</b>   | Will update tree list in next draft. This was not included in the Final Draft (8-12-24).   |
| 7.1.10 - C. 1. (b) | pg. 19 | 6 species for >20 trees is not realistic and the design would be hard/visual aesthetics compromised. Re-work. Maybe 4 species for >20, 5 species for > 30, etc. Make sure this language appears in e.g., design specs or it will never be seen.   | Joelle Teachey | Trees Upstate   | 9/23/23 | <b>Consultants, please validate comment based on discretion</b>  | The species diversity standards were taken from the current riparian buffer diversity standards due to similarity of purpose of the Tree Save Areas to these buffers. The removal of Tree Save Areas and the replacement of TDUs limits the relevance of this comparison. The diversity standards in the Final Draft (8-12-24) will be revised to match the species diversity standard in 7.1.3: Plant Material Standards. This provides for percentages and should better regulate appropriate species diversity for TDU plantings. |
| 7.1.9-3(a)         |        | Tree Protection – Tree Protection Plans. Right now, root protection zones only protect trees that are greater than 12" DBH. We believe specimen trees with a smaller DBH than 12" should be protected during construction. Additionally, we believe Greenville County should follow industry standard best practices regarding measurements for the critical root zone.<br>Recommendation:<br>• If sites to be developed have less tree canopy than the required tree save area, require additional tree planting to meet the goals of this Article.<br>• Include a requirement for tree plantings on a lot that is totally bare. Recommendation:<br>• Revise 7.1.9-3(a) to ensure that the TPP must provide a root protection zone protecting all trees of 8" DBH or more at the margins of tree save areas and all specimen trees.<br>• Amend this section so that the critical root zone must measure a one-and-a-half-foot radius from the trunk of the tree per inch of diameter at breast height. | Sherry Barrett | Upstate Forever | 9/29/23 | <b>Consider...TPP must provide a root protection zone protecting all trees of 8" DBH or more at the margins of tree save areas and all specimen trees.</b> | The root protection zone has been significantly revised based on the removal of the Tree Save Area Approach from the draft and the return to the TDU approach. Based on the changes to the overall structure of the ordinance from the draft, the Staff Technical Advisory decided to adopt a more conservative approach on the new root protection zones.   |
| 7.1.10             |        | Plant Material Installation. Although we appreciate the concern for species diversity, it is not realistic to require a minimum of six species of trees for installations calling for greater than 20 trees. Designing around this requirement would be difficult and the visual aesthetics of the environment would suffer. Recommendation:<br>• Adjust the species diversity requirement to be more realistic such as:<br>o 4 species for over 20 trees<br>o 5 species for over 30 trees<br>• Ensure that species diversity standards are mirrored in relevant administrative and design manuals.   | Sherry Barrett | Upstate Forever | 9/29/23 | <b>Consultants, please validate comment based on discretion</b>  | The species diversity standards were taken from the current riparian buffer diversity standards due to similarity of purpose of the Tree Save Areas to these buffers. The removal of Tree Save Areas and the replacement of TDUs limits the relevance of this comparison. The diversity standards in the Final Draft (8-12-24) will be revised to match the species diversity standard in 7.1.3: Plant Material Standards. This provides for percentages and should better regulate appropriate species diversity for TDU plantings. |

**Article 11, Subdivisions & Group Developments**

No comments

**Article 12, Access & Connectivity**

|    |  |   |           |                                      |         |  |                                  |
|----|--|---|-----------|--------------------------------------|---------|--|----------------------------------|
| 12 |  | Summary: Private developers (including owners of single family homes) will be required to build portions of Multi-use trails as a condition of redevelopment regardless of right of way space if the administrator deems the project activity to be "Substantially rebuilt". I have provided the quotes and page numbers of the code that support this summary and provided emphasis where helpful. | Sam Davis | Upstate Trails and Greenways (UGATA) | 9/12/23 | <b>Add shared use path standards</b><br><br><b>12.5.1 Applicability. Require sidewalks and crosswalks internally and externally in minor subdivisions, major subdivisions, group developments, and commercial developments</b><br><br><b>12.5.2 B. Exemptions. Exempt internal sidewalks in R-R1, R-R3, and R-S zoning districts</b><br><br><b>12.5.2 B. Exemptions. External sidewalks should still be required in R-S zoning districts</b> | Revised all per staff direction. |
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| Article    | Page # | Comment  | Name          | Organization                         | Date     | Staff Comment  | Response / Resolution        |
|------------|--------|--|---------------|--------------------------------------|----------|--|------------------------------|
| 12         |        | Also, I have included the redlined version of the UDO that reflects the changes that we discussed in our meeting a few weeks ago. The biggest change is the one that we discussed in the meeting where the applicability of this code is expanded to all development except non subdivision single family housing. This is the biggest priority because not all of the land that will be needed to execute the Bike/Ped plans will be turned into Major Subdivisions. Ty and I had a meeting to discuss some of the smaller changes to bike/ped standards in order to get the standards to reflect AASHTO. When the standards were unclear we used our best judgement. We also clarified who gets to decide some of the judgement calls related to the fee-in-lieu rules. As you can see from the comments, Ty and I still had some questions on a few pieces of the code that we would like to iron out in the forthcoming meeting. That said, I think this is a much improved draft of the code. (Attachment: Word document, <i>Greenville County UDO</i> .) | Sam Davis     | Upstate Trails and Greenways (UGATA) | 10/3/23  | References Red Lined Version of UDO Article 12 provided by UGATA on 10-3-23        | No action needed             |
| 12.5.2.A.4 | pg. 21 | Add in GTA plans (Pretty sure the TDP is not "officially" approved by the county, but also not all bus stop/sidewalk plans are in the TDP – unless we need to retroactively add them as an "active" appendix – see page 22 comments below).  | Erin Predmore | Greenville Connects                  | 10/14/23 | Add GTA Plans (TDP) to 12.5.2.A.4.   | Revised per staff direction. |
| 12.5.2.C.1 | pg. 21 | Consider adding in "or where bus stops exist or are planned"   | Erin Predmore | Greenville Connects                  | 10/14/23 | Add required sidewalks near existing or planned bus stops 12.5.2.A.                | Revised per staff direction. |
| 12.6.4     |        | As far as increased density/height, I see some accommodation for it in section 12.6.4: Dimensional Standards Bonus. Would it be possible to consider increased incentives for developments on a transit line? Reducing parking requirements to .75/apartment, reducing commercial parking requirements if located on a transit line, or increasing overall allowable height/density (or all of these) would certainly support both controlled growth and the availability of greenspace.   | Erin Predmore | Greenville Connects                  | 10/14/23 | 12.6.4. Add additional incentives including reduced parking and increased density. | Revised per staff direction. |

**Article 14, Stormwater Management**

No comments

**Article 15, Utilities**

No comments