Rural Blight: Characterization of Values and Perspectives of the Visual Environment in Rural areas of Georgia.

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Program Evaluation

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Introduction

Georgians have a deep appreciation and abiding love for the beauty and diversity of the natural landscape. Our rural land especially enriches our lives. The countryside is increasingly attractive as people grow weary of the congestion and lifestyle of the city and suburbs. As a result, the sprawling patterns of residential development at the rural-suburban fringe are impacting the rural landscape at an increasing rate. Conversion of productive agricultural lands to nonproductive estates and subdivisions has impacts on the cultural heritage and social character of rural communities. As is often the case, this sets up a clash of cultures based on land use and concern for the visual environment. The rural landscape is being transformed from an economy based on land devoted to agriculture to new residential development. This development creates a downward spiral where further fragmentation of farms affects their viability. Counties in rural Georgia are seeing their natural environment give way to the pressures of poorly planned concentrated residential development and the decline of the traditional economy.

Urban blight in our cities has been the focus of efforts of partnerships between business, community groups, and municipal governments to revitalize downtown areas impacted by economic decline. Conversely, rural properties are less amenable to redevelopment and revitalization of rural areas is not easy. Alliances at the national level have been formed to beautify Federal Highways by promoting the control of outdoor advertising, junk yards, and other impacts on the aesthetics of our roadside environment. The Federal Highway Beautification Act and the National Scenic Byways Program are examples of national recognition of the cultural value we place on the scenic qualities of our roads. A major contributor to the blight in rural areas is abandoned gasoline stations. Recent federal legislation by the US Environmental Protection

Agency has required all gasoline stations to test their underground storage tanks for leaks. Rural roads are dotted with failed gasoline businesses associated with gasoline that are unable to meet the test requirements or to remediate leaking underground tanks. Special programs are established at the state level to provide tax incentives and limitations on liability for those who will remediate and repurpose these properties (OUST: US EPA 2011).

Literature Review

Open Space in land use literature is typically characterized as any undeveloped land such as agricultural lands, parks, and forests that that still exhibit much of its natural character and amenities. For the local community, preserving open space is particularly challenging. Most people view open space development as a simple trade-off between the value of agricultural production and the potential fiscal value "or highest and best use" in residential or commercial development. Often in valuing open-space for preservation and conservation purposes, we face the conventional wisdom of competing land uses in development versus the purely intrinsic value of open space. Indeed, it is the proximity to residential development that provides the greatest potential value for open spaces. Local planners, conservation groups, and developers have long understood that the "enhancement" market value added to residential development contributed by open space makes it more valuable the scarcer it gets. While the enhancement value based on the proximity to open spaces is proven in the assessment of real estate market values, this direct relationship is greatly influenced by the characteristics of open space (Fausold, 1996).

The US Constitution provides significant property rights to landowners. The Constitution also grants police powers to regulate private activities including the use of private land property to protect public health and welfare (Menthe 2010). Traditionally the use of personal property as one sees fit has been closely associated with personal liberty and efforts to control how an individual

uses their land have been rejected by the courts. The legal rationale for the use of police power in the control of private land use based on aesthetic purposes is found in the U.S. Supreme court ruling in Berman v. Parker (1954). This case broadened the concept of public welfare to include aesthetics. Justice Douglas states in the majority opinion that "the values [public welfare] represents are spiritual as well as physical, aesthetic as well as monetary. It is within the power of the legislature to determine that the community should be beautiful as well as healthy..." (348 U.S. 26, 1954). The U. S. Supreme Court ruled in 1975 that New York City could use police power to preserve cultural aspects of the city. The court decided that..."state and cities may enact land use restrictions or controls to enhance the quality of life by preserving the character and desirable aesthetic features of a city" (438 U.S. 129, 1975).

Georgia is among the twenty-three states that allow aesthetics to be used as the sole basis for regulation. Other states will uphold aesthetic regulations only if they are combined with other factors such as traffic safety or the preservation of property values. The courts in the states with standalone aesthetic legislation cite that the preservation of natural resources and clean and uncluttered environments promote emotional stability and well-being as well as stimulate a sense of civic pride (Perlman 2006). Other court cases have upheld aesthetic regulations recognizing that visual aesthetics is not something that requires some refined sense or preference, but commonly held values that can be used to judge impairments to property the same as foul odors and noise.

Arguably, most legislation and judicial rulings concerning the aesthetics of the visual environment have been concerned with city and town landscapes. In summarizing rural property case law Romero (2010), gives us a good overview of court rulings as they relate to the rights of rural property owners as well as the common law concept of nuisance and how it differs in application between urban and rural places. As might be expected, courts have generally

recognized the particular sights and smells associated with agricultural activity are normal and judged not to be nuisance, however Romero notes that judges rely too much on generalizations about rural people and their lifestyle and don't recognize that rural areas vary widely. Judges should not base judgments on stereotypes but rather on the particular merits of each case. Romero explains that the lower densities of rural areas may put rural property owners at a disadvantage when courts have to balance competing interests that are more financially valuable. In this way, courts apply the common law concept of "balancing the equities" and give preferences to urbanizing influences where more people are involved or more intensive land use promotes economic activity. Courts traditionally have placed the economic growth of the community over rural interests.

"Right to farm" laws have countered the disadvantage rural property owners have when it comes to comes to encroaching development These laws, passed in all 50 states, protect agricultural land use from nuisance suits that result from subsequently established non-agricultural activity (O.C.G.A. § 41-1-7). Since common law does not generally recognize impairments to the aesthetic quality of the rural environment to be nuisances, Romero notes that legislation, while not common in rural areas, may be needed to protect the intrinsic value of the rural landscape. Rural nuisance case law based on the physical effects of odors and noise may not recognize unpleasant sights as nuisances; however, the sight, like the odor or sound, may interfere with the use and enjoyment of the land.

Harvy Flad (1997) believes that the automobile has had a profound effect on the cultural and economic changes of the late twentieth century as the American dream of individual freedom is expressed through mobility. The expansion of more and better highways is mostly associated with the rise of the Automobile in the early 1900's and the mechanization of American agriculture;

however, Flad tells us that the League of American Wheelmen, an association of bicyclist, also helped advance the trend by promoting the expansion of all-weather "macadam" roads in rural routes in New England. Roadside accommodations and attractions proliferated to serve the newly mobile population, and soon larger business would relocate along new cross-country transportation networks that were rapidly replacing the railroads as the backbone of the American economy. Following World War II, growth of the suburban areas the decline of inner cities were all part of social changes that were at work transforming the rural landscape. The countryside was no longer a destination, but a backdrop that could be viewed but not experienced. The highways, once an economic boon to the rural economy that allowed rural life to be experienced up close and facilitated social interaction between country and city folk, gave way to limited-access roads that "isolate and contain the motorist in an environment divorced from its surroundings" (Jackle 1990). The contradictory metaphor of the automobile as both an expression of the ideal of individual freedom in America and instrument of isolation is played out every day as motorist serve their short sentences in automobile solitary confinement along the clogged arteries of the multiple lane interstate highways in and out of Atlanta.

Conflicts between new residents and long time residents have often centered on the presence of junk automobiles on rural properties. Leah Mathews (2002) outlines the main positions in this conflict by reviewing the complexities of the arguments on both sides played out in the rural-urban fringe near Ashville North Carolina. As expected, newer more affluent residents objected to the unsightly rusting automobiles claiming diminished property values; however, long-time residents surprisingly used the same argument to oppose the proposed regulations. In addition to opposition to the new regulations based on resentment of "being told what to do with our property from the Yankees moving to the area", long time residents stated that a prohibition of

junk cars would deprive property owners of a source of income from car parts. They went on to argue that if such a prohibition was in place, that their property values would be impaired since the option to store junk vehicles would not be available to future owners of their property. The opposition was not particularly amused when post cards of abandoned vehicles along the mountain roadways were presented in meetings. Somehow, abandoned automobiles, overgrown with grass, vines, and wildflowers, were fondly reminiscent of traditional mountain life in North Carolina. One opponent of the junk car ordinance warned that zoning was the "kiss of death" to the rights of private property owners. The successful solution of the junk car problem in other jurisdictions, Matthews noted, balanced the application of fines with efforts to use the recovery of scrap value as an incentive. In the northeast, the development of newer generation of steel mills that could economically use scrap as a feedstock was noted as the development that helped rid the rural landscape of junk autos in states in the northeast. Often, local officials were persuaded to act based on the negative environmental impact of junk cars. Contamination of the water table from leaking fluids, attracting pests such as rats and other disease carrying organisms are the most common basis for regulation. Other more innovative approaches gave property owners a one-time property tax credit if they cleaned up their property. As is usual with writing specific regulations, definitions, decision criteria, and enforcement considerations have to be worked out.

As counties in Georgia become urbanized, the citizens adopt comprehensive nuisance ordinances and zoning regulations that reflect the values of the residents and protect the substantial investment in the built environment. They specifically address abandoned vehicles and are necessarily complex in their provisions as well as exclusions. Decatur County adopted such an ordinance in April of 2009. The purpose and intent of the ordinance is "to encourage a clean, healthy, and satisfying environment; one free of nuisances, eyesores, and unhealthy, unsafe, or

devaluating conditions". In drawing up the ordinance, weight was given to the criteria that prospective residents and businesses use in deciding to locate in a particular area and the pride that such an environment can instill in citizens. In the appendix are seven photographs that illustrate the difficulty of applying regulations aimed at correcting the problem of rural blight. While some scenes are clearly rural blight by any standard, others are arguably borderline cases that would have to be judged carefully by the code enforcement officer.

To better understand the challenges to the preservation and enhancement of the visual character of rural landscapes, we have to understand the nature of the problem and build consensus among the stakeholders. We must also respect the property rights of new residents as well as those who have lived in the countryside for generations. The county governments, the Department of Community Affairs, and various state agencies promoting economic development have forged partnerships at the local level that are effective in promoting Georgia's visual resources. Despite the best efforts by these organizations, blighted properties persist in our rural areas.

The Stakeholders

Working with the *County Administrators*, the Georgia Department of Community Affairs (DCA) in their planning guidance documents requires the county to actively promote community characterization based on unique cultural and aesthetic qualities. Crossroad communities and County Gateways are new ways of promoting grassroots planning and preservation of the visual environment in rural areas.

The *Keep Georgia Beautiful* (KGB) public-private partnership, sponsored by the Georgia DCA, coordinates efforts and resources in the community to build and sustain community environmental activities and behaviors resulting in a more beautiful Georgia. Over 70 local affiliates statewide offer a mix of programs based on the needs of the community. The highly

publicized annual events sponsored by the KGB are, the "Great American Cleanup", the "Bring one for the Chipper" Christmas tree recycling event, and the "America Recycles Day". The "Rivers Alive!" program promotes the cleanup of the state's rivers and streams.

The Georgia Film, Music & Digital Entertainment Office (FMDE) has established the *Camera Ready* program, a special designation given to participating Georgia communities interested in attracting film and television production. There are 73 Camera Ready Counties in Georgia. The Camera Ready liaisons are appointed the contact for potential Movie and TV production companies to provide easier, faster, and better access to county production resources and location information. Access to airports and other infrastructure is the primary requirement, but the county often promotes itself as having a variety of shooting locations. This new program spearheaded by the governor's office, is needed due to a dramatic increase in film and television production across the state. Local economic impact from productions can be significant, including hiring of local residents, hotel stays, and purchases of goods and services.

Research Goals

The research goal for this project is to determine the perception of the severity of the problem of rural blight in the unincorporated areas of Georgia. The qualitative research is based on the responses of a survey of county officials who are the stakeholders in leadership positions in county government and countywide agencies involved in promoting the visual character of the rural landscape. The research question to be considered: "Is there a consensus among leaders in the counties concerning the value placed on the visual environment and are the perceptions of rural blight in sufficient agreement to shape local policy?"

Research theory. Perception and definition of the social, cultural, political, and economic problems faced by local government and stakeholders is an essential element in policy formation.

Without consensus about the nature and definition of the problem of rural blight, approaches to enhance the visual character of the rural landscape cannot be formulated. Innes and Booher (1999) state that the consensus building process in planning theory "requires that participants have common information and that all become informed about each other's interests. When the group has explored interests and agreed on facts, they create options develop criteria for choice and make decisions on which they can all agree...[and] produce results that approximate the public interest".

Hypotheses

To test this theory as it relates to the problem of rural blight and the visual character of the rural landscape, the following hypotheses have been formulated to determine the perception of the problem among the three stakeholder groups.

H₀: There is no difference in the perception of rural blight between County

Administrators, leaders of the non-profit Keep Georgia Beautiful involved with promoting beautification of the state, and county liaisons of the Camera Ready program responsible for promoting the development of television and motion picture production in the state.

H₁: Keep Georgia Beautiful County coordinators view rural blight more seriously than the County Administrators and Camera Ready liaisons.

H₂: County Liaisons for the Camera Ready Program view rural blight less seriously than County Administrators and the Keep Georgia Beautiful County coordinators.

H₃: County Administrators' perception of the seriousness of rural blight falls between the Keep Georgia Beautiful County coordinators and Camera Ready Liaisons.

Research Methodology

Data Analysis. The survey use Likert Scaling with responses coded with values one to four. Respondents will select to Strongly Agree, Agree, Disagree, and Strongly Disagree. The

coding of the responses indicates that the respondent perceives the problem of rural blight as severe by numbers approaching the maximum value--4. Conversely, numbers approaching the minimum value--1, will indicate a perception that the problem of rural blight is less severe. Items in the survey imply the feasibility of possible solutions to alleviate specific problem areas and solicit agreement or disagreement on the effectiveness of existing programs as well as the potential of property owners to come together to discuss the issues.

The survey was carried out using the online survey tool, Survey Monkey. Subjects from the three groups were contacted using email addresses that are available to the public on the county and program websites. The questionnaire consists of 10 response items. The ten items were scored and percentages assigned among the four possible responses. Survey items were delivered at by way of email link and were presented to the responders on one page. The initial email introduced the study by a graduate student at Valdosta State University and requested voluntary participation. Each of the three groups was sent identical separate surveys. A reminder followed the initial email after four days. Participation was 30% with the Camera Ready Group, 31% for the Keep Georgia Beautiful Coordinators and 23% for the County Administrators. Respondents were not aware they were part of three different groups.

Results.

The results of the survey are presented in Table-1 below and graphically in Figures 1 to 11. The null hypothesis, H₀, is supported by the results. *Generally, there were no significant* differences or patterns that would indicate major differences in the perception of rural blight in the unincorporated areas of Georgia. The alternative hypotheses that predicted a pattern based on the researcher's conception of the different groups perceptions were not found. Perhaps the remarkable results, shown in Figure 11, are that the overall averages of all responses were identical

between the County Administrators and coordinators of the Keep Georgia Beautiful program at 2.56. Camera Ready liaisons were slightly higher at 2.64. Indeed, rounding to two significant digits would show results identical for the three groups at 2.6. Once again a maximum value of four (4) would indicate a "severe" perception of the problem of rural blight in the countryside.

Survey Items 1, 2, & 3. The responses from the three survey groups indicate that the over indicate that there is agreement that Rural Blight is a major detriment to the visual environment in the unincorporated areas of our counties. Over 80% of the respondents indicated that they agree or strongly agree with the statement. The same percentage also agreed that rural residents that allow their property to become cluttered is a form of rural blight that should be addressed. A majority of respondents across all groups disagreed that rural residents who do keep visually unappealing clutter around their properties would react by creating more objectionable clutter. This phenomenon of making a problem worse after being confronted has been noted in planning literature and the researcher's discussions with local planning officials; however, it is beyond the scope of this paper to fully explore this issue. This study indicates an opposite view, that property owners may be receptive to improving the aesthetic qualities of their properties when approached.

Figures 4, 5 & 6. The result of this series of responses from the three groups is designed to determine the effectiveness of existing efforts. Respondents were asked if county codes and regulations were effective in alleviating the problem of rural blight. The majority of Camera Ready Liaisons and Keep Georgia Beautiful Coordinators believed that county codes were not adequate. Directed at the Camera Ready group, the survey item 6 provides the possibility that some stressed aspects of the countryside could "enhance" the visual character of rural areas. In all three items, Camera Ready Liaisons indicated that existing programs or the consideration of any enhancement value of blighted areas did not affect the rural blight problem. Perhaps providing some validity to

the overall results is that the County Administrator and Keep Georgia Beautiful groups each rated their respective efforts as more effective relative to the other two groups.

Survey Items 7 & 8. Respondents were asked whether they agreed with the scenarios presented in these items, where owners of stressed properties would be receptive to assistance in removing buildings and equipment. Current market trends clearly indicate that scrap metal in any form has recently seen increases in value due to rising commodity prices. The researcher, surveyed local scrap yards and found that an average size automobile is worth \$500 delivered to the yard. Scrap dealers interviewed indicated that community-recycling events typically yielded scrap items the size of large household appliances and smaller and excluded automobiles.

Survey Item 9 & 10. When asked if long-time residents of rural areas are able to collaborate with residents of new developments to uncover new options and creative solutions to enhance the visual landscape, there was general disagreement by the majority of respondents in all three groups. The consensus indicates that the cultural divide between long-time residents and recent refugees from urban areas may be difficult to bridge. In surveying the rural landscape and collecting photo documentation, the researcher was struck at the beauty as well as the diversity found in the rural environment. Each area clearly neglected and prime examples of rural blight, seemed to have a unique story to be told. As a researcher, or stakeholder in the preservation of the rural landscape, the task of revealing the issues of the unique situation with each property seem daunting indeed. It is clear that an intimate and culturally sensitive approach would be needed in such an investigation, however item 10 in the survey addressed the obvious first step. The survey asked respondents to agree or disagree with the statement that the owners responsible for blighted properties are difficult to locate. While the rating averages may indicate a consensus, inspection of the disaggregated data is informative. Camera Ready Liaisons and Keep Georgia Beautiful

Coordinators were divided evenly between those that agree and disagree. County Administrators agreed that those responsible for blighted areas were difficult to locate by a two to one margin to those who disagreed.

Recommendations

The research findings lead to the conclusion that the stakeholders in the preservation and enhancement of the visual environment of the rural landscape should explore opportunities where the convergence of existing programs can find synergy. Camera Ready, Keep Georgia Beautiful, and County Character development efforts of County Planning and the Department of Community Development can emphasize the diversity in the visual character of the rural landscape in conservation and promotional efforts. The research may support the view that no single approach will alleviate the causes of detriments to the aesthetic qualities of the rural landscape. No one solution will drive corrective action given the multiple and seemingly conflicting objectives of the various programs currently in place. There is no shortage of enthusiasm and public participation in current beautification efforts. Innovative and creative approaches to promote the development of new economic opportunities along with the redoubled efforts on the part of state and local planners to preserve and protect the rural heritage of the unincorporated areas in Georgia, indicate that a considered and concerted effort to find long-term and lasting solutions to the problem of rural blight is feasible.

New technologies in Geographic Information Systems may provide tools to facilitate such a coordinated program. Community groups could use a method similar to the Google Street Scene internet mapping technique linked to GIS map and database tools to inventory visual elements of county roads. This inventory can be used to promote the "Camera Ready" Program, monitor changes to the rural environment, and promote awareness among the citizenry. Design recycling

drives to promote recycling heavy equipment and the value of idle scrap could be identified, inventoried, and estimated. The recent prevalence of businesses that appear to prey on the disadvantaged to trade in their gold for cash may indicate that the steel scrap littering the rural landscape could be candidates for recovery of the residual scrap value. While the fundamental good in participation in conservation efforts is sufficient motivation and reward for many, the economic benefits of promoting the visual aesthetics of the rural landscape would move even the most disinterested citizen to join such a program.

Problems with the Research

Since respondents to the survey were chosen from all counties regardless of demographic consideration, counties with higher populations may be over represented. For example, many large counties had multiple coordinators for the Keep Georgia Beautiful Program. Some larger municipalities within counties had their own Keep Georgia Beautiful Coordinator. The smaller the county's population, the more rural, and therefore it is less likely to have the need for well-developed economic promotional activities along the lines of the Camera Ready Program. This fact would also work to have the more rural counties underrepresented in the survey.

There was some overlap between the three groups. The Camera Ready Liaison was likely to be the head of the agency that promotes tourism and convention business within local government. In some small to medium sized counties, there was some indication that the person in the County Clerk position had wide range of responsibilities that may have included leadership positions with the voluntary boards and commissions. New voluntary programs at inception may be delegated to staff members within the local government organization in anticipation of finding qualified volunteers as objectives of the new program become clear. The overlap, not knowing that three separate stakeholder group leaders were being surveyed, and the fundamental realization that

civic minded persons actively pursuing common goals in improving local conditions may be cut from the same cloth, may have influenced the results.

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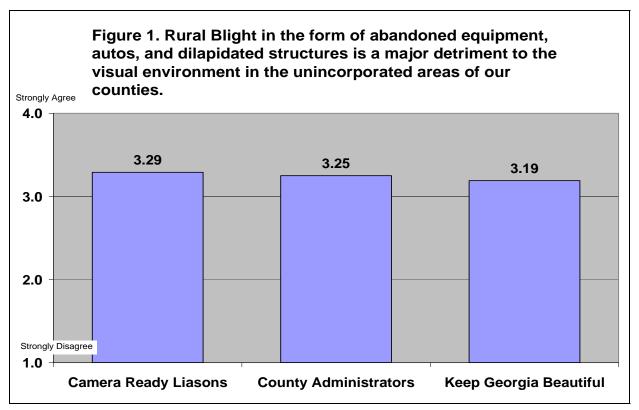
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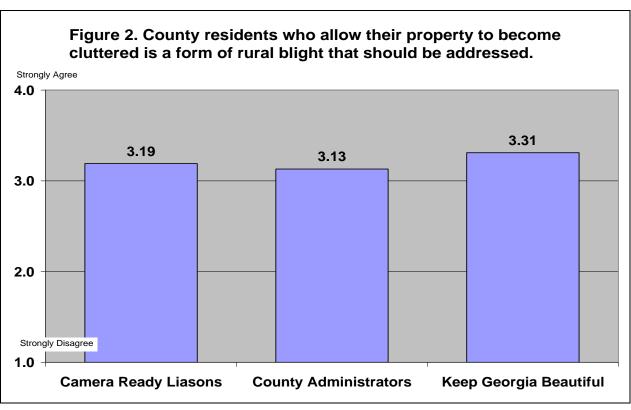
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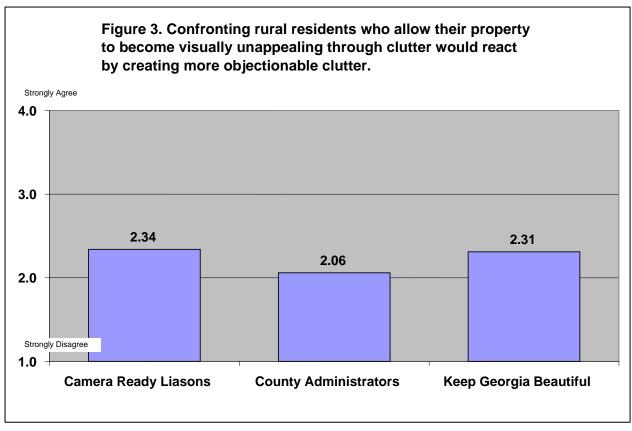
Survey Questionnaire:

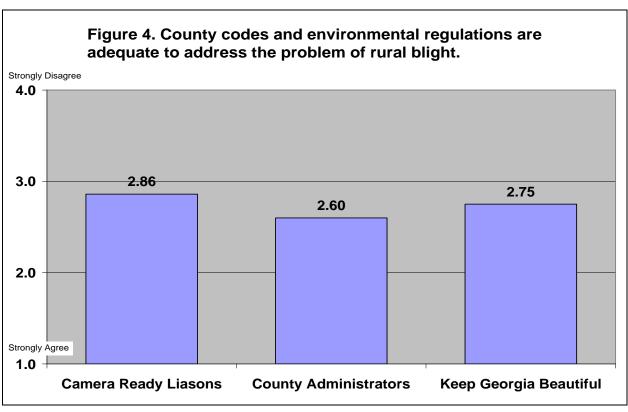
- 1. Rural Blight in the form of abandoned equipment, automobiles, and dilapidated structures is a major detriment to the visual environment in the unincorporated areas of our county.
- 2. County residents who allow their property to become cluttered is a form of rural blight that should be addressed.
- 3. Confronting rural residents who allow their property to become visually unappealing through clutter would react by creating more objectionable clutter.
- 4. County codes and environmental regulations are adequate to address the problem of rural blight.
- 5. County organizations such as Keep Georgia Beautiful are effective to address rural blight.
- 6. Some properties with abandoned and deteriorated farm buildings and equipment add to the rural character and enhance the visual environment of the countryside.
- 7. Blighted property owners would remove abandoned equipment and structures if given assistance with removal.
- 8. Blighted property owners would allow removal of abandoned equipment if given market value of scrap metal minus transportation costs.
- 9. Long-time residents of rural areas are able to collaborate with residents of new residential developments to uncover new options and creative solutions to enhance the visual landscape.
- 10. The owners responsible for blighted properties are difficult to locate.

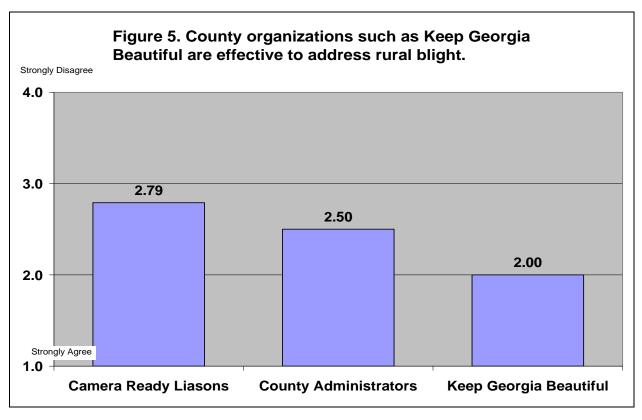
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	Agree (3)	45.2% (14)	64.5% (20)	41.4% (L2)	44.8% (13)	Disagnoe(3)	69.0% (10)	(61) %5'59	25.8% 8]	20.0% (6)	23.3% (7)	(1) %2.09		30%
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	Agree (3)	50.0% (8)	62.5%(10)	12.5% (2)	37.5% (6)	Disagne (3)	46.7% [7]	50.0% (8)	33,3% (5)	12.5% (2)	31.3% (S)	68.8%(11)		23%
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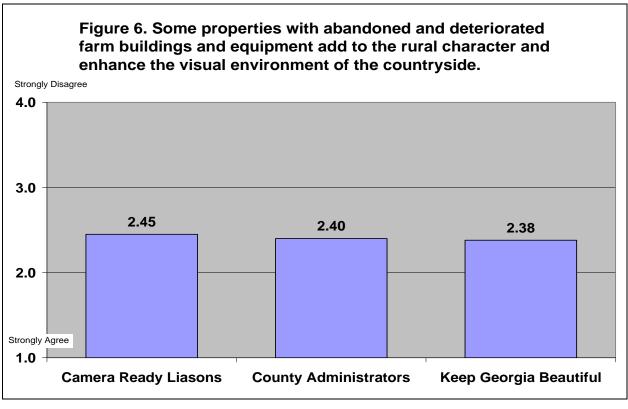


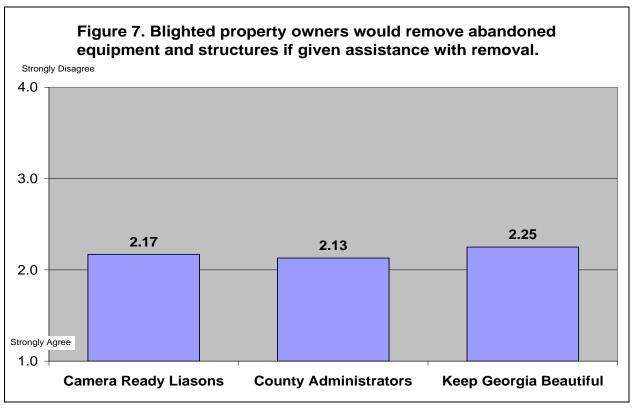


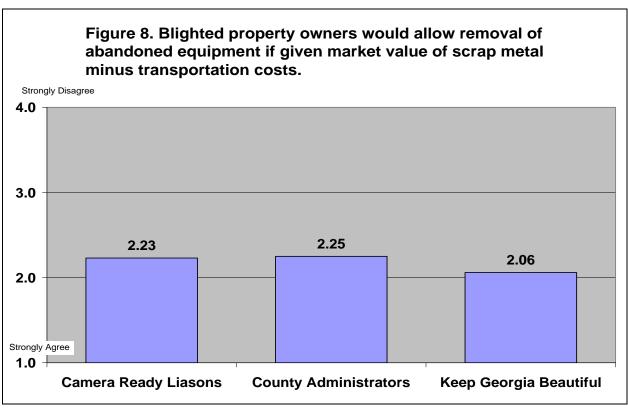


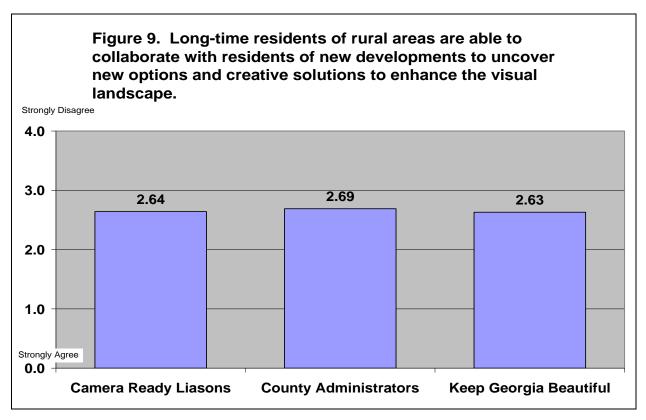


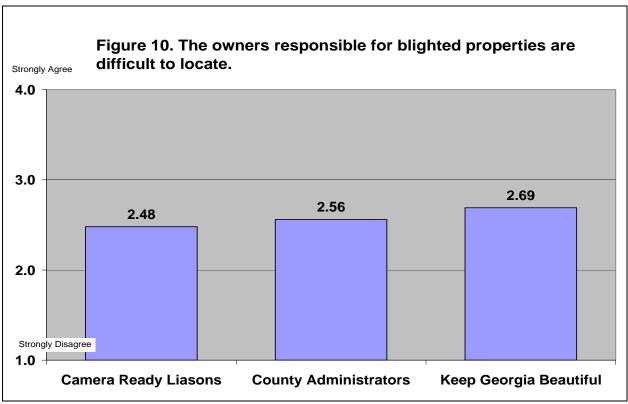


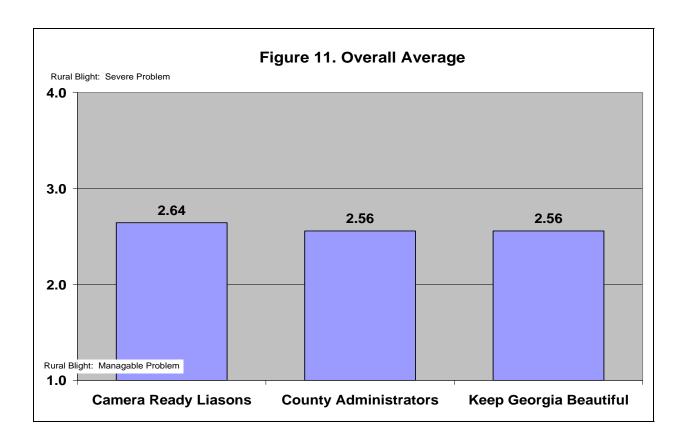












Photograph 1: Rural Blight or Camera Ready Asset? GA 53 west of Dawsonville.



Photograph 2: Old farm equipment artistically applied as an aesthetic visual element in the rural landscape. Carroll County.



Photograph 3: At least \$1500 worth of steel scrap. Large item recycling activities should be a winter activity. Wasps and other wildlife hazard would be minimized. GA 53 west of Dawsonville.



Photograph 4: This property owner takes Camera Ready to a new level. Antique Automobiles could be used to populate street scenes in a TV or Movie production period piece. GA 53 west of Dawsonville.



Photograph 5: This structure is very close to a road at a municipal/county boundary. The researcher is reminded of the scene in the movie Forrest Gump where Jenny's rundown childhood home is demolished. Carroll County.



Photograph 6: At what point in life cycle of a visual relic of the rural economic heritage do such structures become unappealing. How much assistance would a property owner need to keep these structures standing? Coweta County scene.



Photograph 7: Perhaps this scene along GA 16 in Turin, Georgia was once viewed by some as a detriment to the visual character of the town. Barbie Beach is now featured prominently in Turin's promotional literature. Do individuals have a Constitutional right to use their property as a means of expression?



Author: Leigh Swicord

Date: December 5, 2011 6:39 PM

Bill

I was looking forward to reading your paper. I appreciated the legal overview you provided which, I think, is the first thing that comes to mind when discussing government enforcement of "beautification" issues on private property. Your charts and photographs supported your findings and drove home your points. Good job!



Institutional Review Board (IRB) for the Protection of Human Research Participants

PROTOCOL EXEMPTION REPORT

PROTOCOL NUMBER: IRB-02760-2011 INVESTIGATOR: William Nutt

PROJECT TITLE: Rural Blight: Characterization of values and perspectives of the visual environment in unincorporated

areas of GA

DETERMINATION:

- This research protocol is exempt from Institutional Review Board oversight under Exemption Category(ies) 2. You may begin your study immediately. If the nature of the research project changes such that exemption criteria may no longer apply, please consult with the IRB Administrator (irb@valdosta.edu) before continuing your research.
- □ Exemption of this research protocol from Institutional Review Board oversight is pending. You may <u>not</u> begin your research until you have addressed the following concerns/questions and the IRB has formally notified you of exemption. You may send your responses to irb@valdosta.edu.

ADDITIONAL COMMENTS/SUGGESTIONS:

Although not a requirement for exemption, the following suggestions are offered by the IRB Administrator to enhance the protection of participants and/or strengthen the research proposal. If you make any of these suggested changes to your protocol, please submit revisions so that IRB has a complete protocol on file.

Barbara H. Gray Date: 2/24/13 Thank you for submitting an

IRB application.

Barbara H. Gray, IRB Administrator

Please direct questions to irb@valdosta.edu or 229-259-5045.

cc: Dr. James Peterson (Dept. Head)
Dr. Gerald Merwin (Advisor) Form Revised: 09.02.2009