



# METROPOLITAN PLANNING COMMISSION

*"Planning the Future - Respecting the Past"*

M E M O R A N D U M

**TO:** The Planning Commission

**FROM:** MPC Staff

**DATE:** March 1, 2022

**SUBJECT:** Text Amendment to the City of Savannah Zoning Ordinance  
Re: Amendment to Section 7.9, Victorian District  
Contributing Resources Map  
Applicant: Staff initiated

**Leah G. Michalak, Director of Historic Preservation**

**MPC FILE NO: 22-000389-ZA**

## **ISSUE:**

A petition to amend the Contributing Resources Map to include 10 resources of exceptional importance (with regard to historic and architectural significance) that were built in the Victorian District outside of the Period of Significance (1870-1923) and not previously listed as "contributing/historic." This first phase of proposed buildings border Forsyth Park and/or line the Bull Street corridor within the Victorian District boundaries only.

## **BACKGROUND:**

The Victorian Local Historic District (formerly named the Victorian Planned Neighborhood Conservation District) was created in 1981 as part of the Zoning Ordinance for the City of Savannah. The Contributing Resources Map was originally adopted in 1981 by City Council. 912 Drayton Street was added as contributing in 2004. In 2018, the map was updated to include an additional 60 buildings built within the current Period of Significance that were discovered during the 2016 re-survey grant project. That survey grant project did not include buildings that were outside of the Period of Significance but also older than 40 years.

Since the 2016 survey, MPC Preservation Staff is in the process of surveying resources outside of the Period of Significance but also older than 40 years; this consists of 95 resources. Staff has surveyed 51 of these resources to date; staff began the survey with the mid-century resources, the resources surrounding Forsyth Park, and the resources along the Bull Street corridor. This is because, due to recent perceived development pressures, these are the most vulnerable resources at this time.

Prior to the adoption of the new zoning ordinance (NewZO) on September 1, 2019, it was not possible for resources outside the Period of Significance to be surveyed; however, with the adoption of NewZO came the ability to add resources outside of the Period of Significance if they are of "exceptional importance". An example is 1001 Whitaker Street, which was deemed

eligible for individual listing on the National Register of Historic Places in 2011; however, the local historic district did not have the authority to amend the Contributing Resources Map to add it as contributing.

Two (2) resources within the above-described survey area were singled out by the State Historic Preservation Office as individually eligible for listing on the National Register of Historic Places:

1. **Map No. 19, 805 Whitaker Street:** Nominated and determined eligible in 2008 as an unusual example of an apartment building type that is not well represented in Georgia.
2. **Map No: 127, 1001 Whitaker Street:** Nominated and determined eligible in 2011 as an excellent example of the Modern Movement style of architecture. It was the current owner of this property who, in 2001, nominated the building for individual listing on the National Register of Historic Places. Individual listing, which is a much higher level of significance than listing as part of a historic district. Although determined eligible by the State Historic Preservation Office, the nomination was never completed.

The City of Savannah Zoning Ordinance, as adopted on September 1, 2019, provides for the evaluation of all non-contributing resources to be considered for contributing status. Resources outside of the Period of Significance are evaluated using the following standard from Sec. 3.18.8:

*Exceptional Importance. Contributing buildings include a select group of exceptional resources constructed outside the district's Period of Significance. These resources possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet one of more of the above criteria.*

### **PROJECT HISTORY:**

This project was first docketed on the February 8, 2022, Planning Commission agenda. However, after pre-meeting discussion, the Commission voted to table the item to the March 8, 2022, meeting in order to provide additional public notice.

Staff sent letters to each of the property owners (11 buildings at that time) and all tenants. Staff received phone calls from several of the property owners, as well as emails and one letter. Two (2) property owners (124 West Park Avenue and 1015 Whitaker Street) were against listing their buildings, two property owners requested additional information regarding the listing (1315 Bull Street and 805 Whitaker Street) which was sent to them, and one property owner sent a letter (1001 Whitaker Street) speaking against their listing. Additionally, one property owner asked staff to visit the building with him (1201 Bull Street) to view the interior specifically; stating that there was no historic fabric left. Staff visited the site (photos attached); although there is some historic fabric, such as the curved storefront along Bull Street and the steel windows (visible from the interior) there is an active Certificate of Appropriateness (COA) application [File No. 21-004442-COA] for a complete rehabilitation including replacement of the steel windows (which is permitted because it is not a contributing building); therefore, when the rehabilitation is complete the only historic element remaining will be the curved storefront. Staff has removed this building from the recommended list of building to be added as contributing.

The only other active COA application for the remaining 10 building is for stucco repairs to 1315 Bull Street [File No. 21-000903-COA]; this work does not affect staff's recommendation for listing as contributing.

At the February 8, 2022, Planning Commission meeting, the Commission suggested that the survey of all buildings 40 years old and older (95 buildings as referenced earlier in the report) be complete prior to requesting this text amendment. The Executive Director reported that surveys come at a great expense (average of \$100 per resource) and, if buildings were not addressed as the survey progressed, it could be years before a text amendment could be recommended, potentially resulting in the loss of historic fabric and/or buildings. In response, staff created a map with a phased approach to this project as follows (see attached map):

- Phase One: Forsyth Park and Bull Street corridor survey and text amendment – first quarter of 2022 (current proposal).
- Phase Two: Text amendment to change the Period of Significance from 1923 to 1932 based on State Historic Preservation Office (SHPO) and Federal documentation, and to add contributing buildings from that time period to the Contributing Resources Map (approximately 40 buildings) – second quarter of 2022.
- Phase Three: West Side survey and text amendment – time frame is budget dependent.
- Phase Four: East Side survey and text amendment – time frame is budget dependent.

Staff recommends that the City include the cost to survey Phases Three and Four in their next available budget.

There were some questions at the February 8, 2022, Planning Commission meeting, from Commission members as well as the public, regarding the speed at which staff applied for and recommended this text amendment; therefore, staff provides the following information that this project has been part of the MPC Work Program since 2020, appears in the 2021 MPC Annual Report as a future project for 2022, and has been discussed by the Savannah Historic Preservation Commission (HPC), which oversees this district, since the Commission's formation in mid-2020. Specifically, these 10 buildings were presented to the HPC at their February 23, 2022, regular meeting.

As per another statement at the same meeting, staff provided additional findings regarding the Art Deco style associated with 1015 Whitaker Street (see attached).

### **FINDINGS:**

1. Currently, all buildings within the local design review area for the Victorian Historic District are reviewed for any exterior changes visible from a public right-of-way. However, only those buildings that are listed as contributing on the Contributing Resources Map are guaranteed protection against demolition.
2. Ten (10) resources listed as non-contributing on the Contributing Resources Map, outside of the Period of Significance but older than 40 years, were analyzed by the MPC Historic Preservation Department for "Exceptional Importance." Per Sec 3.18.8 of the ordinance, resources are to be evaluated using the following criteria to determine "Exceptional Importance:"
  1. Are associated with events that have made a significant contribution to the broad patterns of our history; or
  2. Are associated with the lives of significant persons in our past; or
  3. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
  4. Have yielded, or may be likely to yield, information important in historic or prehistory.

Also consulted were the following documents: The 1973 “A Survey of Savannah’s Historic District” by Historic Savannah Foundation, the 1980 “Victorian District Building Survey and Evaluation” by Beth Lattimore Reiter (Historic Preservation Consultant), “Savannah Victorian District: Rehabilitation Design Guidelines” by the MPC, HSF, and the City of Savannah, the 1974 “Victorian District National Register Nomination,” the 1980 “Victorian District National Register Boundary Amendment,” the 2016 Historic Resources Survey and Report, the National Register Nomination Form and SHPO eligibility letter for 1001 Whitaker Street, the National Register Nomination Form for 2 East Henry Street, and the National Register Nomination Form and SHPO eligibility letter for 805 Whitaker Street.

Staff has determined that the 10 resources meet Criteria 1 and 3 and are, therefore, exceptional important and must be protected against demolition.

3. All resources proposed to be added fall outside of the district’s current Period of Significance but are within the boundaries of the National Register and local Historic Districts. However, all were recommended, by the consultant for the 2016 survey, to be added to the National Register listing as “historic”. Additionally, staff located several attempts to survey this district’s mid-century resources within the MPC’s records; however, the project (for reasons unknown) was never completed.

#### **POLICY ANALYSIS:**

1. Taking no action leaves these 10 resources unprotected especially with regard to demolition. This neighborhood contains valuable early and mid-century architecture that, if demolished, would be difficult to replicate. The buildings have smaller footprints on larger parcels with existing infrastructure that is expensive to build with new construction development.
2. The state enabling legislation provides for the preservation and protection of historic buildings, structures, appurtenances, and places that are of basic and vital importance for the development and maintenance of Savannah’s tourism industry, its culture, and for the protection of property values because of their association with history, and their unique architectural details. An on-going update of the Victorian District Contributing Resources Map and the periodic comprehensive evaluation of all of the district’s resources (regardless of age) is vital to this mandate.

#### **ALTERNATIVES:**

1. Recommend approval of the request to amend the Zoning Ordinance as proposed.
2. Recommend an alternate amendment; amend Zoning Ordinance with select buildings/resources.
3. Recommend denial of the request.

**RECOMMENDATION:**

**Amend the Victorian Historic District Contributing Resources Map to include 10 buildings of exceptional importance that were built in the Victorian District outside of the Period of Significance (1870-1923) and not previously listed as “contributing/historic” with an immediate effective date.**

**MW: LGM**

**Note:** This recommendation could change subject to new information provided at the meeting. Final decisions will be made by the Commission at the public hearing based on information provided at the meeting, as well as information submitted for the staff recommendation.

**ANALYSIS OF BUILDING TYPES FOR ADDITION TO THE  
 VICTORIAN HISTORIC DISTRICT CONTRIBUTING RESOURCES MAP**

The Victorian District is a 78-block area contiguous to the Savannah National Historic Landmark District that forms a cohesive unit. The district also includes the southern portion of Forsyth Park which was originally added for military purposes and became known as the military parade ground. The district possesses a rich collection of late 19<sup>th</sup> century, early 20<sup>th</sup> century, and mid-20<sup>th</sup> century architecture. These buildings attest to Savannah as a modern evolving city. It is for these reasons that the building fabric must be analyzed on a continuous basis to ensure the preservation of essential elements to the district and the city as a whole.

All buildings proposed to be added as contributing/historic were constructed in the early to mid-20<sup>th</sup> century. Some, such as 1001 Whitaker Street, are excellent high-style examples of Mid-Century Modern architecture and others, such as 1315 Bull Street, illustrate the vernacular version of mid-century architecture specific to Savannah. All are equally important in order to tell a comprehensive history of Savannah’s development.

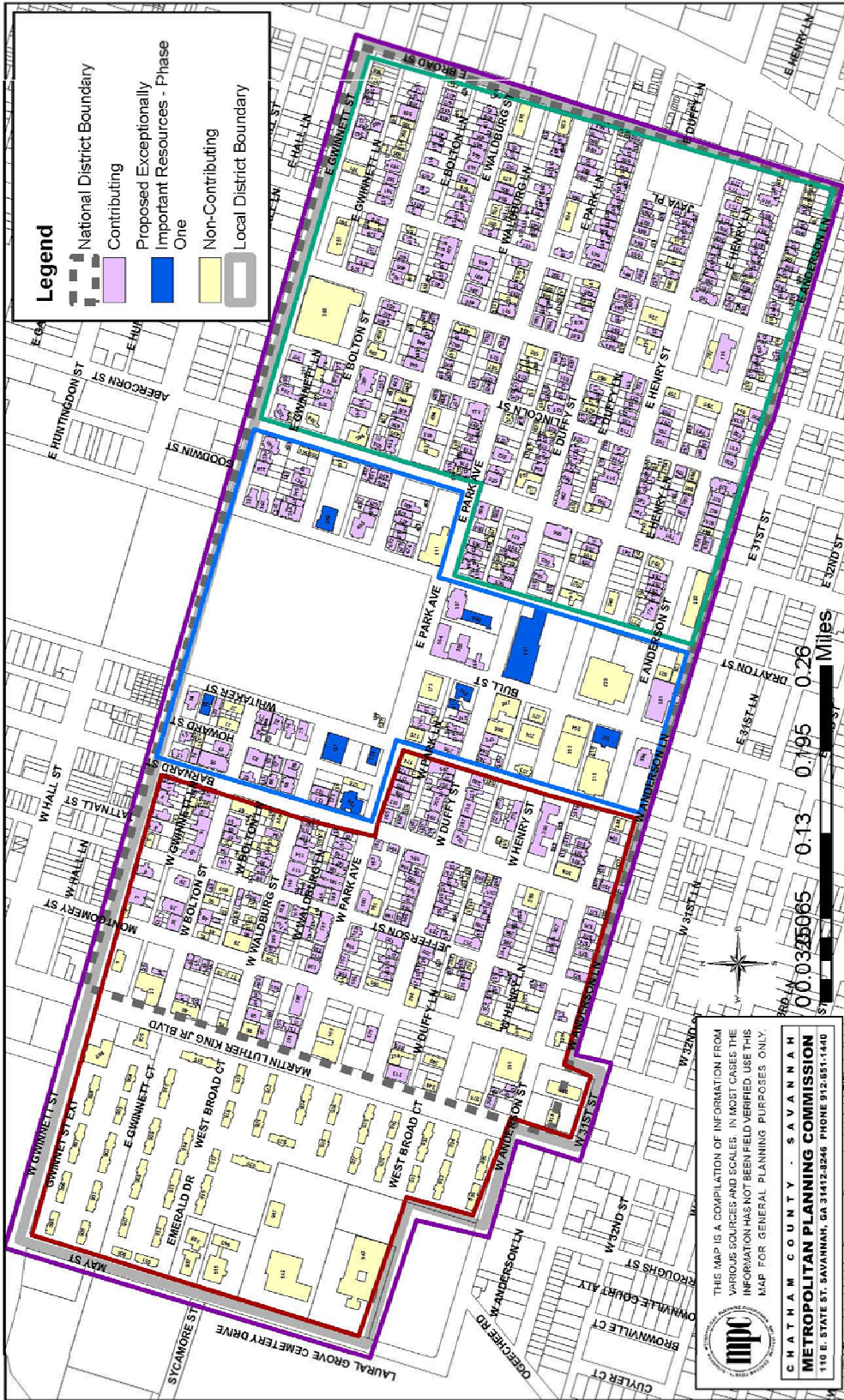
**Proposed Exceptionally Important Resources**

<p><b>Map No. 19:</b>          Address: 805 Whitaker Street          Built: 1926          Style: None (vernacular apartment bldg)          PIN: 20044 11026</p>	<p><b>Map No. 125:</b>          Address: 124 West Park Avenue          Built: 1965          Style: Elements of Italianate          PIN: 20044 24003</p>
<p><b>Map No. 127:</b>          Address: 1001 Whitaker Street          Built: 1961          Style: Modern Movement          PIN: 20044 25001</p>	<p><b>Map No. 128:</b>          Address: 1015 Whitaker Street          Built: 1957          Style: Art Deco (vernacular version)          PIN: 20044 25002</p>
<p><b>Map No. 211:</b>          Address: 6 West Duffy Street          Built: 1932          Style: Neoclassical Revival          PIN: 20044 31002A</p>	<p><b>Map No. 212:</b>          Address: 1111 Bull Street          Built: 1932          Style: Neoclassical Revival          PIN: 20044 31002</p>
<p><b>Map No. 317:</b>          Address: 1315 Bull Street          Built: 1950          Style: Elements of Modern Movement          PIN: 20053 08003</p>	<p><b>Map No. 392:</b>          Address: 906 Drayton Street          Built: 1959          Style: Modern Movement          PIN: 20044 20012</p>
<p><b>Map No. 558:</b>          Address: 17 East Park Avenue          Built: 1927          Style: Elements of Italianate          PIN: 20044 32001</p>	<p><b>Map No. 661:</b>          Address: 2 East Henry Street          Built: 1946          Style: American Modern Movement          PIN: 20044 37001</p>



**VICTORIAN HISTORIC DISTRICT Contributing Resources Map**

Updated: March 1, 2022



THIS MAP IS A COMPILATION OF INFORMATION FROM VARIOUS SOURCES AND SCALES. IN MOST CASES THE INFORMATION HAS NOT BEEN FIELD VERIFIED. USE THIS MAP FOR GENERAL PLANNING PURPOSES ONLY.

**CHATHAM COUNTY - SAVANNAH**  
**METROPOLITAN PLANNING COMMISSION**  
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**Phases**

- Phase One Text amendment to add resources of "exceptional importance" as a result of future survey of buildings that are 40 years old or older - First Quarter of 2022.
- Phase Two Text amendment to change POS to 1932 based on SHPO and Federal documentation and to add contributing buildings from that time period - Second Quarter of 2022.
- Phase Three Text amendment to add resources of "exceptional importance" as a result of future survey of buildings that are 40 years old or older - Budget Dependent.
- Phase Four Text amendment to add resources of "exceptional importance" as a result of future survey of buildings that are 40 years old or older - Budget Dependent.