



METROPOLITAN PLANNING COMMISSION

"Planning the Future - Respecting the Past"

M E M O R A N D U M

TO: The Planning Commission

FROM: Edward Morrow, Director of Development Services

DATE: June 11, 2024

SUBJECT: Map Amendment to the City of Savannah Zoning Ordinance
Re: Amendment to Article 7, Section 7.13, Figure 7.13-1,
Hotel Development Overlay District
Applicant: Robert McCorkle for HOS Management, LLC

MPC FILE NO: 24-000558-ZA-TEXT

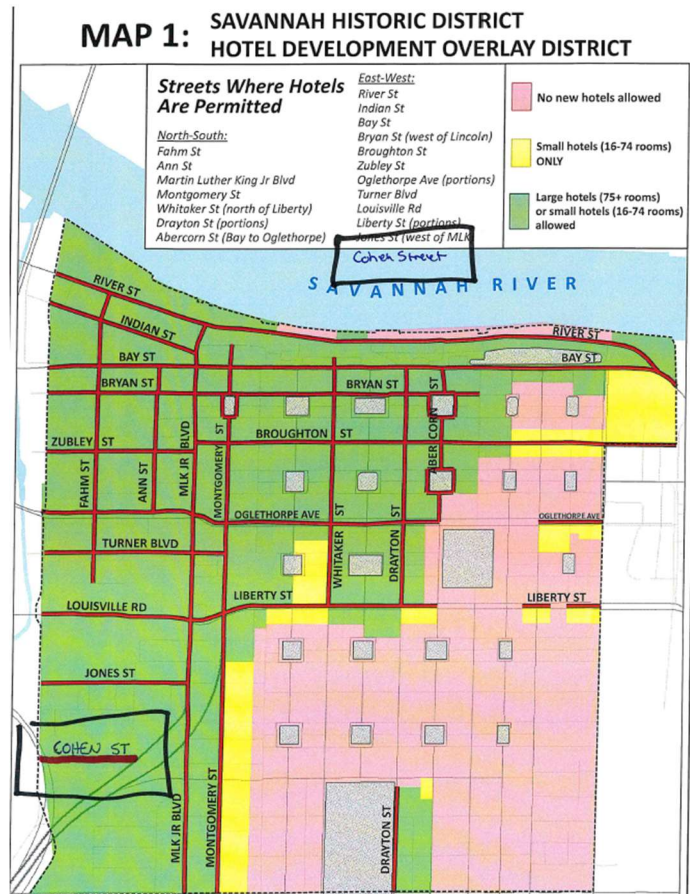
REQUEST:

A petition to amend Article 7, Section 7.13, Figure 7.13-1, Hotel Development Overlay District, to permit hotel development on parcels adjoining Cohen Street.

BACKGROUND:

The Hotel Development Overlay (HDO) District was adopted as a feature of Savannah's New ZO in an effort to direct hotel development to appropriate areas with sufficient capacity and connectivity to handle large-footprint structures with significant off-street parking requirements and high vehicular trip generation. The tool was also employed as a means to protect the historic character of Savannah's Downtown Historic District.

The HDO distinguishes two categories of hotels: large, having 75 guest rooms or more, and small, having 16-74 guest rooms. Establishments having 15 or fewer guest rooms are not within the scope of the provisions of the HDO and are subject only to standard development regulations established by the Ordinance. Further, large and small hotels developed within the HDO area are still required to meet all site-specific development requirements.



The Overlay employs two primary mechanisms to regulate hotel location: 1) color coding to distinguish approved siting locations, and 2) red highlighting of thoroughfares having sufficient capacity to handle traffic generated by intense uses. Areas colored green and adjoining a red thoroughfare are appropriate for large hotel development. Areas colored yellow and adjoining a red thoroughfare are deemed appropriate for small hotel development. Areas colored pink are unsuitable and not approved for hotel development.

FACTS AND FINDINGS:

1. The Petitioner proposes to construct a hotel on parcels adjacent to Savannah Station, originally constructed in 1912, and identified by the Board of Assessors as a ‘Cocktail Lounge.’ The structure, located at 601 Cohen St, is identified as a contributing resource (#1732).
2. The site is currently zoned [D-X \(Downtown Expansion\)](#) and a Zoning Certification Letter issued by the City’s Zoning Administrator has been attached to the agenda along with related exhibits.
3. The subject parcels are within the Landmark Historic District and would require a COA for recombination under recently adopted amendments to the City’s Subdivision Regulations.
4. Approval of the requested amendment would also authorize future hotel development on an approximately 11.53 ac parcel zoned D-X that is presently owned by the Board of Education and currently developed as Esther F. Garrison School for the Arts.
5. Historic Jewish cemeteries are located on both the north (Levi Sheftall Family Cemetery - #1730) and south (Mordecai Sheftall Cemetery - #1731) sides of Cohen Street, both believed to date to the mid-1700s. Both are listed as contributing resources within Choctaw Ward.
6. The present petition is submitted with an associated petition to amend the Historic District height map to permit 5-story development by-right adjoining Selma and Cohen Streets (24-000559-ZA-TEXT).
7. *Section 8.3.1* of New ZO requires that burial plots be a minimum of 100’ from a residential use or residentially-zoned parcel. This standard would ordinarily apply to the establishment of a new cemetery; however, in this instance, both The Blake apartments and Esther F. Garrison School happen to be outside of a 100’ perimeter of both cemeteries. *The school appears to be set back exactly 100’ from the Levi Sheftall Cemetery.*



Green buffers represent 100’ boundary from Jewish cemeteries

8. While no specific concept is within the scope of the present petition, [Section 7.8.10.Lii](#) of *New ZO* regarding additions to contributing resources requires that additions be subordinate in height and mass to the resource. This carries implications for the height and mass of any proposed structure that is designed as an *addition* to Savannah Station.
9. A representative for the owners of one of the historic cemeteries submitted research showing that historically the boundaries of the cemetery were larger than is presently indicated by the existing walls. The research suggests areas within the proposed development site that are speculated to contain burials.
10. The Petitioner has provided ground penetrating radar data from the site indicating that no graves were identified within the area proposed for hotel development.
11. COS Traffic Engineering submitted documentation that queuing of vehicles on Cohen Street in relation to regular operations of Ester Garrison School makes the proposed addition of hotel uses in this area inadvisable.

ORDINANCE ANALYSIS:

Per section 3.7.7 of Article 3, Savannah’s Zoning Ordinance offers four (4) review criteria for proposed text amendments:

- a. **Consistency** – The extent to which the proposed text amendment is consistent with the remainder of the Zoning Ordinance, including any purpose and intent statements.

MPC Staff Comment: While access via a roadway of specified classification is not a requirement in the Downtown zoning districts, a critical factor in the siting of a ‘hotel’ (*16 or more guest rooms*) is the functional capacity of adjoining thoroughfares to safely accommodate increased traffic volumes. Cohen Street, ‘unclassified’ in SAGIS, principally serves the purpose of connecting West Boundary and Selma Streets. On its north side, Cohen provides ingress/egress to rear/surface parking for Esther F. Garrison School for the Arts and is traversed by school children and faculty/staff to access a BOE-owned playground on its south side. Cohen also likely provides access to unimproved parking for events at Savannah Station. Parking, stopping and standing are prohibited along the full length of the north side of Cohen Street (*Div. II, Appendix 1, Code of Ordinances*).

Cohen Street was likely excluded from the original Hotel Overlay because of its proximity to sites of historical significance. Historic Jewish cemeteries are located on either side of Cohen. *Section 8.3.1* of the Zoning Ordinance requires that cemeteries be setback 100 feet from a residential use or zoning district. This standard would ordinarily apply to the establishment of a new cemetery; however, development of the nearby school, built in 2006, reflects application of this provision, as a fence was erected approximately 20 feet from the boundary of the cemetery, and the building is setback an additional 80 feet. The setback from the cemetery on BOE property has no impervious surface. This suggests concern for avoiding any potential harm to identified culturally significant resources.

- b. **New or Changing Circumstances** – The extent to which the proposed text amendment represents a new idea not considered in the existing Zoning Ordinance, or represents a revision necessitated by changing circumstances over time.

MPC Staff Comment: *The proposed amendment represents the extension and application of an existing Ordinance provision. MPC Staff contends that Cohen Street was appropriately excluded from the original map as hotel development is likely incompatible in the current context of the site proposed for development.*

- c. **Error or Inappropriate Standard** – Whether or not the proposed text amendment corrects an error in the Zoning Ordinance, or otherwise improves upon existing requirements or standards.

MPC Staff Comment: *The proposed amendment does not correct any error in the Zoning Ordinance. A request to restrict the location of the large-footprint, high-impact uses within the scope of this Section is consistent with the preservation efforts found in the associated Sections of the Ordinance regarding development of parcels in the Landmark Historic District.*

- d. **Compliance with Higher Law** – Whether or not the proposed text amendment revises the Zoning Ordinance to comply with state or federal statutes.

MPC Staff Comment: *The proposed amendment is not a revision to bring a local ordinance into conformance with state or federal law.*



A view of Savannah Station and The Blake from the site proposed for development on Cohen St (right).

ALTERNATIVES:

1. Recommend approval of the request or an alternate amendment.
2. Recommend denial of the request.

MPC STAFF RECOMMENDATION:

MPC Staff recommends **denial** of the request to amend Section 7.13, Figure 7.13-1, Hotel Development Overlay District, to permit hotel development adjoining Cohen Street.

If, however, the Planning Commission is inclined to support the request, Staff recommends approval for inclusion of **only the segment of Cohen Street between Selma Street and the substandard driveway identified as Coyle Street.**

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.