

COUNTY COUNCIL OF BEAUFORT COUNTY  
ADMINISTRATION BUILDING  
BEAUFORT COUNTY GOVERNMENT ROBERT SMALLS COMPLEX  
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COUNTY ATTORNEY

ASHLEY M. BENNETT  
CLERK TO COUNCIL

AGENDA  
NATURAL RESOURCES COMMITTEE

Monday, March 19, 2018

**3:00 p.m. Time Change**

Executive Conference Room, Administration Building  
Beaufort County Government Robert Smalls Complex  
100 Ribaut Road, Beaufort

Committee Members:

Brian Flewelling, Chairman  
Roberts "Tabor" Vaux, Vice Chairman  
Rick Caporale  
Gerald Dawson  
Steve Fobes  
York Glover  
Alice Howard

Staff Support:

Anthony Criscitiello, Planning Director  
Gary James, Assessor  
Eric Larson, Division Director  
Environmental Engineering  
Dan Morgan, Mapping & Applications Director

1. CALL TO ORDER – **3:00 P.M. Time Change**
2. UPDATE / PREVIOUS PLANNING COMMISSION MEETING
3. UPDATE / PREVIOUS SOUTHERN LOWCOUNTRY REGIONAL PLANNING COMMISSION (SOLOCO) MEETING
4. DISCUSSION OF A POTENTIAL RESOLUTION IN SUPPORT OF PRESCRIBED BURN (DARRYL JONES, FORESTRY PROTECTION CHIEF, SC FORESTRY COMMISSION) ([backup](#))
5. DISCUSSION / MITCHELLVILLE ADDITIONAL COMMITMENT (AHMAD WARD, EXECUTIVE DIRECTOR, MITCHELLVILLE PRESERVATION PROJECT, AND MAYOR DAVID BENNETT, TOWN OF HILTON HEAD ISLAND)
6. UPDATE / WATERFRONT PARK EXTENSION INTO WHITEHALL DEVELOPMENT (BILL PROKOP, CITY OF BEAUFORT MANAGER, AND MAYOR BILLY KEYSERLING, CITY OF BEAUFORT)
7. POTENTIAL CHANGES TO COMMUNITY DEVELOPMENT CODE (CDC) AND COMPREHENSIVE PLAN
  - A. Buckingham Community
  - B. U.S. Highway 170 / Bluffton Parkway
  - C. Hilton Head National
8. TEXT AMENDMENT TO THE BEAUFORT COUNTY COMMUNITY DEVELOPMENT CODE (CDC), ARTICLE 3, SECTION 3.3.50 REGIONAL CENTER MIXED USE (C5) ZONE STANDARDS (TO ALLOW HOTEL TO APARTMENT CONVERSION ON UNIT TO UNIT BASIS); APPLICANT: MICHAEL KRONIMUS ([backup](#))



9. SOUTHERN BEAUFORT COUNTY MAP AMENDMENT / OSPREY POINT (MALIND BLUFF)  
PUD MASTER PLAN AMENDMENT REQUEST FOR R600 013 000 0006 0000 (119.90 ACRES  
EAST OF HIGHWAY 170, OKATIE); OWNER / APPLICANT: LCP III, LLC / MR. J. NATHAN  
DUGGINS, AGENT: JOSH TILLER ([backup](#))
10. SOUTHERN BEAUFORT COUNTY MAP AMENDMENT / RIVER OAKS (MALIND POINTE)  
PUD MASTER PLAN AMENDMENT REQUEST FOR R600 013 000 008C 0000 (+/-  
63.54ACRES EAST OF HIGHWAY 170, OKATIE); OWNER / APPLICANT: BBI HOLDING /  
MR. ROGER L. SAUNDERS; AGENT: JOSH TILLER ([backup](#))
11. CONSIDERATION OF REAPPOINTMENTS AND APPOINTMENTS
  - A. Rural and Critical Lands Preservation Review Board
    1. One Vacancy (Council District 5)
  - B. Southern Beaufort County Corridor Beautification Board
    1. Three Vacancies (Council District 5, Council District 6 and Council District 11)
12. EXECUTIVE SESSION
  - A. Discussion of negotiations incident to proposed contractual arrangements and proposed purchase  
of property
    1. Project 2018-BW
    2. Project 2018-HN
13. ADJOURNMENT

## RESOLUTION 2018/\_\_\_

### A RESOLUTION TO SUPPORT PRESCRIBED FIRE

**WHEREAS**, Beaufort County Council recognizes that prescribed fire provides multiple ecological, economic and cultural benefits to the citizens of Beaufort County;

**WHEREAS**, prescribed fire is a traditional land management practice and public safety tool that helps prevent and lessen the severity of wildfires, reducing the loss of private property and saving lives while acting as a preventive measure saving taxpayers the cost and hazards to local government's public safety and firefighting officials who respond to wildfires;

**WHEREAS**, prescribed fire is a valuable tool used by forest landowners and managers in reducing hazardous fuels, reducing the risk of destructive wildfires, preparing sites for both natural and artificial forest regeneration, improving access to and the appearance of land, and controlling detrimental insects and forest diseases;

**WHEREAS**, prescribed fire is used to restore and maintain fire-dependent ecosystems, and to manage wildlife habitat for many species;

**WHEREAS**, many rural economies depend on prescribed fire to manage habitat for game species such as white-tailed deer, wild turkey and bobwhite quail whose hunting economy is vital to South Carolina;

**WHEREAS**, prescribed fire is used to manage for songbirds and other non-game wildlife species, and for fire-dependent plants, and is a vital tool to maintain aesthetically-pleasing landscapes, all of which bring in substantial tourism dollars to South Carolina;

**WHEREAS**, the South Carolina Forestry Commission is authorized by various South Carolina state laws to control wildfires, administer burning laws, and provide other forestry assistance, and the commission promotes prescribed burning as a valuable forest management tool;

**WHEREAS**, the South Carolina General Assembly passed the Prescribed Fire Act in 1994 (amended in 2012), defining prescribed fire thus, "Prescribed fire means a controlled fire applied to forest, brush, or grassland, vegetative fuels under specified environmental conditions and precautions which cause the fire to be confined to a predetermined area and allow accomplishment of the planned land management objectives.";

**WHEREAS**, prescribed fire helps keep South Carolina's forests healthy -- and those forests, in turn -- provide ecological services such as clean air and clean water and contribute to the quality of life of the state's citizens and to local economies;

**WHEREAS**, prescribed fire practitioners provide public health benefits by burning under carefully-planned weather conditions, reducing the unplanned smoke from wildfires, thus contributing to the air quality of South Carolina by promoting healthy forests that serve as "air shed contributors;"

**WHEREAS**, prescribed fire is a traditional land management tool in the South that has been practiced for thousands of years and is an integral part of South Carolina's cultural and natural heritage;

**NOW, THEREFORE, BE IT RESOLVED, THAT THE COUNTY COUNCIL OF BEAUFORT COUNTY, SOUTH CAROLINA** supports the appropriate and continued use of prescribed fire in South Carolina,

**AND, BE IT FURTHER RESOLVED THAT** the Beaufort County Council supports the South Carolina Forestry Commission, South Carolina Department of Natural Resources, Clemson University, The Nature Conservancy, the South Carolina Prescribed Fire Council and others as they strive to provide educational and technical assistance to landowners in an effort to recognize the benefits listed above,

**AND, BE IT FURTHER RESOLVED THAT** the Beaufort County Council urges Air Quality Regulators to work closely with all state agencies and landowners in a fair and balanced approach to smoke management.

Adopted this \_\_\_\_ day of March, 2018.

COUNTY COUNCIL OF BEAUFORT COUNTY

BY: \_\_\_\_\_  
D. Paul Sommerville, Chairman

APPROVED AS TO FORM:

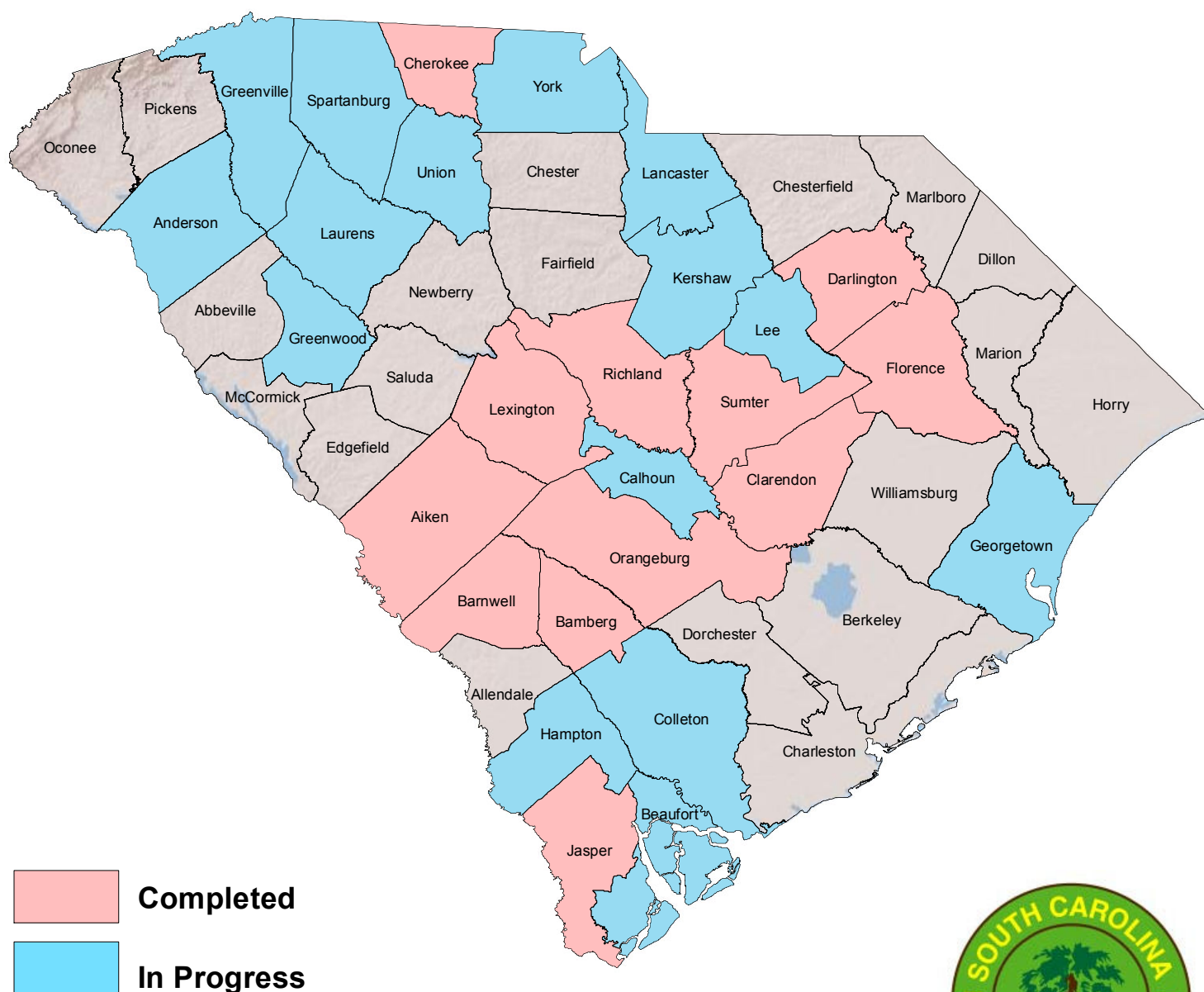
\_\_\_\_\_  
Thomas J. Keaveny, II, Esquire  
Beaufort County Attorney

ATTEST:

\_\_\_\_\_  
Ashley M. Bennett, Clerk to Council



# SC Counties with Passed Resolution in Support of Prescribed Fire (As of January 9, 2018)



2018  
South Carolina Forestry Commission  
5500 Broad River Road  
Columbia, SC 29212



**DISCLAIMER:** This is a product of the South Carolina Forestry Commission. Reasonable efforts have been made to ensure the accuracy of this map. The SCFC expressly disclaims responsibility for damages or liability that may arise from the use of this map. Not to survey standards.



## MEMORANDUM

**To:** Beaufort County Natural Resources Committee

**From:** Anthony J. Criscitiello, Community Development Director

**Subject:** Text Amendment to the Beaufort County Community Development Code (CDC): Article 3, Section 3.3.50 Regional Center Mixed-Use to permit unit-per-unit conversion of Lodging to Multi-Family

**Date:** February 09, 2018

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### **PLANNING COMMISSION RECOMMENDATION from the excerpt of its February 5, 2017, draft minutes:**

Mr. Robert Merchant briefed the Commissioners on the text amendment. The new owners of the Bluffton Suburban Lodge, located east of Lowe's along Highway 278, behind MacDonald's, are interested in turning the extended-stay hotel, unit for unit, into efficiency apartments. The building was built in 2000. The project is located in the C5 regional center mixed-use district where hotels and multi-family uses are permitted; however 150 units on 3.13 acres is problematic since the multi-family use density is 15 units per acre. Staff recommended a text amendment; however, Staff made several provisions including the hotel having existed for five years rather than using the amendment to bypass the density issue, building code issues being separate from the CDC, and parking issues with hotels requiring 1 space per room versus 1.25 spaces per apartment. The existing site has parking issues. Traffic impacts for apartments are considered nominally greater than a hotel. Staff recommends approval since smaller units could possibly provide a niche in the lower-end housing supply. He noted that the county is going through a housing needs assessment and the results may expand or move this amendment to another zoning district.

Commission discussion included whether the owner did a market research on the demand of studio apartments.

Applicant's Comment: Mr. Michael Kronimus, the applicant, noted there was a huge demand for that type of housing in that location. Service staff levels are not being met on Hilton Head Island; work force housing is needed. These units are 500 to 700 square feet. We can combine the rooms to form 1-bedrooms, since most are studio apartments. A parking issue exists. Workforce housing is the aim; however, some tenants won't have vehicles, so parking may not be the problem since there is access to a major thoroughfare for tenants to take a bus or Uber.

Additional Commission discussion included querying whether the intent is to market as workforce housing, concern with the lack of firewalls for apartments, fearful of unintended consequences since the text amendment could be used in other zones where hotels transfer ownership but property deterioration is not addressed, querying whether regional significance was addressed regarding notifying municipalities of the proposed text amendment (*Mr. Merchant said this amendment did not trigger the regional significance aspect so he had not notified the municipalities.*), noting the logical evolution from hotel to multi-family, noting the cramped and confined space of the specific inn that led to this proposed text amendment, concern that a density capacity has not been set, noting the lack of amenities for children on the site, concern that there are no schools within walking distance of the property and school buses access would be problematic, concern that the amendment would allow more hotel to apartment conversions throughout the County, desiring input from the School District and the municipalities, querying the average occupancy rate of area hotels, affirming that the municipalities have a desperate need for affordable housing, querying when the workforce housing assessment would be completed (*Mr. Merchant*

*noted that the target draft was set for March 2018.*), querying how soon the Commission could receive input from the municipalities on the proposed text amendment, and noting that the Town of Bluffton had an Affordable Housing Committee.

Mr. Kronimus noted, in regards to firewalls, that that building codes requirement would be addressed in another process. In regards to other zones using the text amendment, only a small amount of zones would allow the hotel to multi-family conversion. Mr. Kronimus stated that parking at the proposed site would not be met with the existing regulations.

Mr. Merchant reiterated that the parking requirements can be increased or decreased by 20%, but the applicant must submit a parking study that will be reviewed by the County Traffic Engineer. He noted that the site has no access to the Bluffton Parkway or to the trail. He stated that the Staff doesn't want to create a parking problem because there is nowhere to park offsite.

Mr. Kronimus noted that the bottom line is if the text amendment is approved, it doesn't mean that project will be approved. This is truly a workforce housing opportunity. This is a C5 zone that is the most dense zoning allowed in Beaufort County. He stated that the owner could raze building and build another unit with higher density on the 3.2 acre property. This location could be downzoned to a T-zone to allow a higher density. There are various items that must be met by Building Codes so there's a long way to go. The property is next door at a T4 zone with an unlimited density, but the parking calculation must be met.

**Public Comment:** None was received.

**Motion:** Mr. Ed Pappas made a motion, and Ms. Diane Chmelik seconded the motion, **to recommend to County Council a denial of the Text Amendment to the Beaufort County Community Development Code (CDC), Article 3, Section 3.3.50 Regional Center Mixed Use (C5) Zone Standards (to allow hotel to apartment conversion on unit to unit basis) because the Housing Needs Assessment had not been completed.** Discussion included a clarification of the motion. The motion **failed (FOR: Chmelik and Pappas; AGAINST: Hennelly, Hincer, and Semmler; ABSENT: Fermin, Stewart, and Vacancy/St. Helena Island Representative).**

**Motion:** Mr. Jason Hincer made a motion, and Mr. Kevin Hennelly seconded the motion, **to recommend to County Council approval of the Text Amendment to the Beaufort County Community Development Code (CDC), Article 3, Section 3.3.50 Regional Center Mixed Use (C5) Zone Standards (to allow hotel to apartment conversion on unit to unit basis) with the condition that input should be received from the municipalities that are affected and their respective affordable housing committees.** The motion **passed (FOR: Hennelly, Hincer, and Semmler; AGAINST: Chmelik and Pappas; ABSENT: Fermin, Stewart, and Vacancy/St. Helena Island Representative).**

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## **STAFF REPORT:**

### **A. BACKGROUND:**

|                              |   |
|------------------------------|---|
| <b>Case No.</b>              | ZTA 2018-01   |
| <b>Applicant:</b>            | Michael Kronimus, KRA Architects  |
| <b>Proposed Text Change:</b> | Text Amendment to the Beaufort County Community Development Code (CDC): Article 3, Section 3.3.50 Regional Center Mixed-Use to permit unit-per-unit conversion of Lodging to Multi-Family |

## **B. SUMMARY OF REQUEST:**

The Community Development Department was approached by the new owner of Suburban Lodge in Bluffton about the possibility of converting the extended stay hotel into an apartment building. The Suburban Lodge has 150 extended stay units on 3.13 acres. The new owner wanted to convert the hotel unit per unit to efficiency apartments with long-term leases. The property is located in C5 Regional Mixed-Use where both hotels and multi-family are permitted uses. Multi-family, however, has a maximum density of 15 dwelling units per acre. The project was not able to move forward because the unit-per-unit conversion would result in a multi-family development with triple the density than what is permitted in the district.

**Proposed Amendment:** Staff directed the applicant to consider a text amendment that would allow for hotels that convert to multi-family developments to exceed the maximum permitted density with appropriate conditions attached. The applicant responded with a formal zoning amendment request that allows for a unit-to-unit conversion with the following conditions:

- The hotel shall have been in continuous operation for a minimum of five years.
- To the greatest extent practicable, the site shall be revised to comply with the existing standards for multi-family residential.
- The site shall meet the parking requirements for multi-family residential as established in Article 5, Division 5.5.

The proposed amendment is attached to this report.

**Impact on Parking and Transportation:** In analyzing the potential impacts of this proposed amendment, staff identified parking as the greatest concern. The Community Development Code only requires hotels to have one parking space per unit, while it requires efficiency apartments 1.25 spaces per unit. Converting from extended stay to permanent residency, there is a greater likelihood of households having more than one vehicle, and for residents to have visitors. Therefore, any conversion would need to provide adequate parking. Traffic impacts were not a major concern. The change of use would only result in a modest increase in trip generation (6 to 12%). For example, the conversion of an extended stay hotel of 150 units would increase the daily trips from 936 to 998; am Peak hour trips from 72 to 77; and pm peak hour trips from 83 to 93.

**C. ANALYSIS: Sec. 7.7.30(C). Code Text Amendment Review Standards.** The advisability of amending the text of this Development Code is a matter committed to the legislative discretion of the County Council and is not controlled by any one factor. In determining whether to adopt or deny the proposed text amendment, the County Council shall weigh the relevance of and consider whether, and the extent to which, the proposed amendment:

- 1. Is consistent with the goals, objectives, and policies of the Comprehensive Plan:** The proposed amendment has the potential to introduce multi-family uses in areas dominated by retail and services. The Comprehensive Plan calls for promoting mixed-use development at higher density nodes along major travel corridors. This recommendation is in the Land Use, Affordable Housing (Recommendation 8-7), Economic Development (Recommendation 7-7), Energy (Recommendation 9-2), and Transportation (Recommendation 10-7) Chapters. The objective is to promote quality development that encourages internal trip capture, multiple modes of transportation, a mix of housing (including affordable housing), and energy efficiency.
- 2. Is not in conflict with any provision of this Development Code or the Code of Ordinances:** The Community Development Code only requires hotels to have one parking space per unit, while it requires efficiency apartments 1.25 spaces per unit. This conflict has the potential of creating multi-family sites with inadequate parking.
- 3. Is required by changed conditions:** The proposed amendment provides greater flexibility for a hotel to respond to market conditions.



4. **Addresses a demonstrated community need:** The proposed amendment has the potential to promote affordable and workforce housing by increasing the supply of efficiency and studio apartments.
5. **Is consistent with the purpose and intent of the zones in this Development Code, or would improve compatibility among uses and ensure efficient development within the County:** The Regional Center Mixed-Use (C5) Zone currently permits multi-family uses.
6. **Would result in a logical and orderly development pattern:** See item #5.
7. **Would not result in adverse impacts on the natural environment, including but not limited to water, air, noise, stormwater management, wildlife, vegetation, wetlands, and the natural functioning of the environment:** It is staff's opinion that the natural resource protection, stormwater and performance standards in the CDC will minimize impacts to the environment.

**D. RECOMMENDATION:** Staff recommends approval.

**E. ATTACHMENTS:**

- Proposed changes to the CDC
- Application

### 3.3.50 Regional Center Mixed Use (C5) Zone Standards

#### A. Purpose

The Regional Center Mixed Use (C5) Zone permits a full range of retail, service, and office uses. The Zone's intensity accommodates regional and community commercial and business activities. Uses include large, commercial activities that serve the entire County and highway-oriented businesses that need to be located on major highways. While this use intends high-quality, commercial character, the setback or build-to-line, landscaping and other design requirements provide a uniform streetscape that makes provision for pedestrian and transit access. The Zone is intended to be more attractive than commercial areas in other counties to maintain the attractive tourist and business environment and have minimal impact on surrounding residential areas. The Zone is not intended to be a strip along all arterials and collectors. In developing areas, the minimum depth of a parcel along an arterial or collector shall be 600'. The minimum zone size shall be 20 acres. In the older, built-up areas, new uses shall have depths and areas equal to or greater than similar uses in the area. This Zone shall be located in areas designated "regional commercial" in the Comprehensive Plan.

#### B. Building Placement

##### Setback (Distance from ROW/Property Line)

|       |          |
|-------|----------|
| Front | 25' min. |
|-------|----------|

Side:

|                          |          |
|--------------------------|----------|
| Side, Main Building      | 15' min. |
| Side, Ancillary Building | 15' min. |

|      |          |
|------|----------|
| Rear | 10' min. |
|------|----------|

##### Lot Size

|          |                |
|----------|----------------|
| Lot Size | 21,780 SF min. |
| Width    | 150' min.      |

##### Note:

For development within a Traditional Community Plan meeting the requirements of Division 2.3, setback, minimum lot size and minimum site area requirements of the transect zone established and delineated on the regulating plan shall apply.

#### C. Building Form

##### Building Height

|                           |                |
|---------------------------|----------------|
| All Buildings             | 3 stories max. |
| Ground Floor Finish Level | No minimum     |

#### D. Gross Density<sup>1</sup> and Floor Area Ratio

|                                |                                  |
|--------------------------------|----------------------------------|
| Density                        | 15.0 d.u./acre max. <sup>2</sup> |
| Floor Area Ratio <sup>23</sup> | 0.37 max.                        |

<sup>1</sup>Gross Density is the total number of dwelling units on a site divided by the Base Site Area (Division 6.1.40.F)

<sup>2</sup>Lodging that is converted unit per unit to multi-family residential may exceed maximum density with the following conditions:

1. The hotel shall have been in continuous operation for a minimum of five years.
2. To the greatest extent practicable, the site shall be revised to comply with the existing standards for multi-family residential.
3. The site shall meet the parking requirements for multi-family residential in Article 5, Division 5.5.

<sup>23</sup>Requirement applies to non-residential buildings.

#### E. Parking

##### Required Spaces: Residential Uses

|                               |  |
|-------------------------------|--|
| Single-family detached        | 3 per unit                                 |
| Single-family attached/duplex | 2 per unit                                 |
| Multi-family units            | 1.25 per unit                              |
| Accessory dwelling unit       | 1 per unit                                 |
| Community residence           | 1 per bedroom                              |
| Live/work                     | 2 per unit plus 1 per 300 GSF of work area |

##### Required Spaces: Services or Retail Uses

|                               |   |
|-------------------------------|---|
| Retail, offices, services     | 1 per 300 GSF                           |
| Restaurant, café, coffee shop | 1 per 150 GSF                           |
| Drive-through facility        | Add 5 stacking spaces per drive-through |
| Gas station/fuel sales        | 1 per pump plus requirement for retail  |
| Lodging: Bed and breakfast    | 2 spaces plus 1 per guest room          |
| Lodging: Inn/hotel            | 1 per room                              |

##### Required Spaces: Industrial Uses

|   |                 |
|---|-----------------|
| Light manufacturing, processing and packaging | 1 per 500 GSF   |
| Warehousing/distribution                      | 1 per 2,000 GSF |

For parking requirements for all other allowed uses see Table 5.5.40.B (Parking Space Requirements).

## Childs, Barbara

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**From:** Greenway, Eric  
**Sent:** Wednesday, March 14, 2018 8:40 AM  
**To:** Vaux, Tabor; Bennett, Ashley; Flewelling, Brian; Criscitiello, Anthony; Merchant, Robert; Larson, Eric  
**Cc:** Gruber, Joshua; Harris, Cheryl; Keaveny, Thomas; Inglese, Christopher; Childs, Barbara; Spade, Heather  
**Subject:** RE: Draft Agenda / Natural Resources Committee 031918  
**Attachments:** 2-19-2018 Response to Hotel to Multi-Family Text Amendment.pdf; Hilton Head Island Response.pdf; Bluffton Suburban Lodge 021518.pdf

Good Morning,

Attached are the letters from the various jurisdictions pertaining to the Hotel to Apt. Conversion Amendment that is currently being considered by the NRC. We have not contacted the fire district since the same building codes will apply to the building and its access regardless of the building's use. The Community Development Department, during the drafting of this amendment, met with the appropriate officials regarding any special code concerns or requirements that may be needed due to the conversion language and the overall nature of the amendment. As result of those meetings and having determined no additional code issues needed addressing we have not sought additional input from the fire district. The fire code is regulated and enforced by County's Building Department.

Also, there was a question raised about overall occupancy rates between hotels and apartments and after some quick research we have determined that Beaufort County hotel vacancy rates are in the 36-40 percent range and apartments are in the 13-14 percent range. Therefore, we can probably expect around 40 vacant hotel rooms per day for every 100 rooms and 14 apartments per 100 units per month.

If you have any questions, please do not hesitate to contact me.

Ashley,

Please feel free to pass this email along to the remaining County Council members or other stakeholders that may need to see this.

*Eric L. Greenway, AICP  
Beaufort County  
Community Development Department  
PO Drawer 1228  
Beaufort, SC 29901-1228  
Phone: 843-255-2143*

One body is smarter than any body and that is every body!

**From:** Vaux, Tabor  
**Sent:** Tuesday, March 13, 2018 11:25 AM  
**To:** Bennett, Ashley <abennett@bcgov.net>; Flewelling, Brian <brianf@bcgov.net>; Criscitiello, Anthony <tonyc@bcgov.net>; Merchant, Robert <robm@bcgov.net>; Greenway, Eric <egreenway@bcgov.net>; James, Gary

Lisa Sulka  
*Mayor*  
Larry Toomer  
*Mayor Pro Tempore*  
Marc Orlando  
*Town Manager*



*Council Members*  
Fred Hamilton  
Dan Wood  
Harry Lutz  
Kimberly Chapman  
*Town Clerk*

February 19, 2018

Robert Merchant, AICP  
Assistant Director  
Beaufort County Community Development  
PO Drawer 1228  
Beaufort, SC 29902

TRANSMITTED ELECTRONICALLY  
[robm@bcgov.net](mailto:robm@bcgov.net)

Re: Proposed Text Amendment to the Beaufort County Community Development Code (CDC):  
Article 3, Section 3.3.50 Regional Center Mixed-Use to permit unit per unit conversion of  
Lodging to Multi-Family Uses

Dear Mr. Merchant,

Please accept this letter as the Town of Bluffton's official response to the request for comments on the proposed text amendment to the Beaufort County Community Development Code to permit a unit per unit conversion of Lodging to Multi-Family in the Regional Center Mixed-Use (C5) Zoning District. Bluffton Staff appreciates that the Beaufort County Planning Commission requested input from all municipalities in the County since this proposed text amendment has countywide implications.

Based on the information provided, this is a text amendment that will affect all hotels in the C5 Mixed Use Zone, however, the Applicant, Mr. Kronimus with KRA Architects, is working specifically for the owners of the Suburban Lodge. The hotel consists of 150 rooms located on SC Highway 278, which the owner intends to convert unit per unit to efficiency apartments with long-term leases. It is unknown by Bluffton Staff if any of these units are considered lock-out units. The C5 zoning district allows by right hotels and multi-family developments, however, multi-family developments have a maximum density of 15 units per acre. If the 150-room hotel (on 3.13 acres) was converted to multi-family units, it would equate to 48 units/acre, triple the density than what is permitted in the district for multi-family.

With the limited time to review the proposed text amendment and provide comments, Town of Bluffton Staff have multiple concerns we request be considered prior to final approval. While the text amendment will potentially affect all hotels that are located in the Regional Center Mixed-Use District, staff has concerns specifically with the Suburban Lodge site which include the following:

- Traffic
  - The Suburban Lodge is located along SC Highway 278 adjacent to McDonald's and Circle K gas station. There is only one access point to the road with no traffic signal to provide a safe left turn movement.

*Theodore D. Washington Municipal Building*  
20 Bridge Street P.O. Box 386 Bluffton, South Carolina 29910  
Telephone (843) 706-4500 Fax (843) 757-6720  
[www.townofbluffton.sc.gov](http://www.townofbluffton.sc.gov)

- A recommendation would be to require a traffic assessment completed prior to any conversion to determine what traffic patterns would be affected by the change (ex. students traveling to and from school).
- A recommendation would be to require that the property acquire a secondary access directly to Bluffton Parkway.
- Open Space
  - There is a lack of useable open space for residents.
  - A hotel use is not required to provide the same amount of useable open space as a multi-family development. With long-term leases, it is highly likely that there will be residents with children. There is no place available for amenities typically provided in a multi-family development (ex. playgrounds, walking trails, or open fields).
- Workforce Housing
  - While the Applicant states that there is a need for workforce housing in the region, there is no discussion about incentives, covenants, or deed restrictions that would maintain any of the units at an affordable rate based on Beaufort County's most recent Area Median Income. Town of Bluffton Staff would recommend that restrictive covenants are established to ensure that if these are indeed workforce housing units that they are guaranteed for a designated amount of time.
- Parking
  - A hotel use has a lower minimum parking requirement than a multi-family use. By allowing the conversion of unit per unit, there is automatically a twenty percent (20%) shortage of parking that places an undue burden on adjacent properties. The Community Development Code requires 1 space per hotel unit, for a 150 room hotel that is 150 parking spaces. A multi-family development with 150 apartments is required to have 1.25 spaces per apartment (188 parking spaces).

While this is not an exhausted listed due to the amount of time to review and provide a response, Town Staff would recommend that there is additional research to review the proposal and determine the implications there are for this type of land use change on a countywide level. If you would like to follow up with me regarding any of the concerns listed above, please don't hesitate to contact me at 843.706.4529 or by email at [kicard@townofbluffton.com](mailto:kicard@townofbluffton.com).

Sincerely,

*Kevin P. Icard*

Kevin P. Icard, AICP  
Planning & Community Development Manager

Cc: Marc Orlando, ICMA-CM, Town Manager  
Mayor and Town Council

*Theodore D. Washington Municipal Building  
20 Bridge Street P.O. Box 386 Bluffton, South Carolina 29910  
Telephone (843) 706-4500 Fax (843) 757-6720  
[www.townofbluffton.sc.gov](http://www.townofbluffton.sc.gov)*

# TOWN OF HILTON HEAD ISLAND

One Town Center Court, Hilton Head Island, S.C. 29928

(843) 341-4600 Fax (843) 842-7728

[www.hiltonheadislandsc.gov](http://www.hiltonheadislandsc.gov)

David Bennett  
Mayor

Kim W. Likins  
Mayor Pro Tem

Council Members

David Ames  
Marc A. Grant  
William D. Harkins  
Thomas W. Lennox  
John J. McCann

Stephen G. Riley  
Town Manager

February 16, 2018

Tony Criscitiello  
Planning Director  
100 Ribault Rd  
Beaufort, SC 29901

RE: Text Amendment to the Beaufort County CDC – Hotel to MF Conversion

Dear Tony:

Thank you for submitting a copy of the application of the subject matter to the Town of Hilton Head Island. In the spirit of the Southern Beaufort County Regional Plan's (SCBRP) implementation strategies Town Staff has taken the opportunity to review the information and make the following comments:

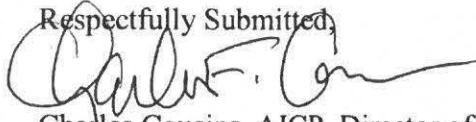
Town staff echoes the concerns raised by the County planning staff and the Planning Commission. With the latest buzz around workforce housing needs the pressure to allow flexibility and creative solutions is likely to increase. While there are merits to the proposed conversion proposal, there are significant challenges related to building code compliance and meeting important design standards. In addition, the proposed amendments do not condition the conversion on meeting the stated goal of providing affordable, work force housing. Most affordable, workforce housing products include a minimum timeframe for the units to remain affordable, ensuring the benefits gained by the owner from favorable conversion are commensurate to the benefit provided to the public.

The Town agrees with language requiring an established period of operation (in this case 5 years) of a hotel use to qualify for conversion. Without this language the door would be open for developing higher density hotels with the thought of quick conversion to multifamily. In addition, effective implementation of the proposed 1:1 unit conversion rate would result in significant increases over the by right density for multifamily development. The Town suggests the county consider a conversion rate lower than a 1:1 ratio.

Finally, the Town understands that the amendment alone does not guarantee projects or conversions of existing sites. However, should they arise, every attempt to meet the intent and purpose of the County CDC should be made, including, but not limited to, parking standards, access management, design considerations and traffic impacts.

These comments are provided to for your consideration and review. Again,  
thanks for the opportunity to provide input.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Charles Cousins", with a long horizontal flourish extending to the right.

Charles Cousins, AICP, Director of Community Development

February 15, 2018

Tony Criscitiello  
Beaufort County Planning Division  
Post Office Drawer 1228  
Beaufort, SC 29901-1228

Re: Proposed Regional Center Mixed-Use to permit unit-per-unit conversion of Lodging to Multi-Family

Dear Mr. Criscitiello,

I am writing this memo in the Planning Commission Recommendation for the Regional Center Mixed-Use to permit unit-per-unit Conversion of Lodging to Multi-Family. A formal request for school district support has not been requested. I would like to give the opinion of the school district on this development. While the Beaufort County School District is a proponent of economic growth and free enterprise, residential development produces an increased student population, dictating the need for additional facility capacity and staff resources. The provision of the additional educational facilities and workforce becomes the responsibility of the Beaufort County taxpayers and the Beaufort County School District. At this time there are no revenue sources available to the County or the school district to fund the additional school facilities and associated staff required for the continued residential growth in the Bluffton area.

The change of the Suburban Lodge from apartment dwelling to 150 multi-family units would attract families with school age children. Because of the possible addition of public school students and the lack of additional resources available to support those students, I would not recommend support of this residential development to the Beaufort County School District Board of Education. The County is currently investigating impact fees. I believe that this a project where impact fees should be considered. I would be able to support a development of this nature with appropriate impact fees in place to cover the educational need of the additional school age children projected for this development.

Sincerely,

Jeffery C. Moss, Ed.D  
Superintendent, Beaufort County School District

Re: Rob Merchant, Beaufort County  
Tonya Crosby, Beaufort County School District  
Carol Crutchfield, Beaufort County School District  
Michael Kronimus, KRA Architects



## Childs, Barbara

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**From:** Josh Tiller <josh@jktiller.com>  
**Sent:** Wednesday, March 14, 2018 3:07 PM  
**To:** Childs, Barbara  
**Cc:** rschartz@villageparkgroup.com; Charles Norris; Lewis Hammet  
**Subject:** March Natural Resources Meeting

**Importance:** High

Mrs. Childs,

I behalf of the applicants for both River Oaks (Malind Pointe) and Osprey Point (Malind Bluff) at Okatie Village, I am requesting that the Natural Resource Committee not place our projects on the March 2018 Natural Resource Committee agenda. Due to Monday's meeting to discuss the Traffic Impact Analysis, it has been determined that the time needed to address Colin Kinton's comments before the March meeting would not be adequate to provide a complete update to the TIA. Therefore, we would like to be postponed until the April 2018 NRC meeting.

Kind Regards,

**JOSH K. TILLER, PLA, ASLA** | President  
2017 President, ASLA South Carolina  
Clemson Architectural Foundation Trustee

**J. K. TILLER ASSOCIATES, INC.**  
**LAND PLANNING | LANDSCAPE ARCHITECTURE**  
181 Bluffton Road, Suite F203, Bluffton, South Carolina 29910  
**Voice:** 843.815.4800 **Fax:** 843.815.4802  
**Web:** [www.jktiller.com](http://www.jktiller.com) **Facebook:** [J. K. Tiller Associates](#)

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