



C H A T H A M C O U N T Y - S A V A N N A H

## METROPOLITAN PLANNING COMMISSION

*"Planning the Future - Respecting the Past"*

M E M O R A N D U M

**DATE:** DECEMBER 15, 2020

**TO:** THE MAYOR AND ALDERMEN OF THE CITY OF SAVANNAH

**FROM:** METROPOLITAN PLANNING COMMISSION

**SUBJECT:** MPC RECOMMENDATION

**PETITION REFERENCED:**

**Rezone Lynes Avenue from I-L to I-H**

**Jane & Anthony Abbot Marital Trust et al., Owner/Agent**

**PINs: 20632 01014, -015, -016, -017, -018, 20631 02019, -020, -028**

**Acreage: 18.22 Acres**

**Aldermanic District: 1 (Lanier)**

**County Commission District: 8 (Ellis)**

**File No. 20-005170-ZA**

**MPC ACTION:**

**Deny** the petitioner's request to change the zoning at multiple parcels on Lynes Avenue from the I-L Zoning District to the I-H Zoning District.

**MPC STAFF RECOMMENDATION:**

**Deny** the petitioner's request to change the zoning at multiple parcels on Lynes Avenue from the I-L Zoning District to the I-H Zoning District.

**MEMBERS PRESENT:** 9 + Chairman

Ellis Cook, Chairman	Linder Suthers
Michael Brown	Joseph Welch
Travis Coles	Tom Woiwode
Joseph Ervin	
Karen Jarrett	
Tanya Milton	
Wayne Noha	

**PLANNING COMMISSION VOTE:** Approve Staff Recommendation (8-2)

APPROVAL Votes: 8	DENIAL Votes: 2	ABSENT
Cook Brown Coles Ervin Jarrett Milton Suthers Woiwode	Welch Noha	Parker Manigault Smith

Respectfully submitted,



Melanie Wilson  
Executive Director

/jh

Enclosure

cc Mark Massey, Clerk of Council  
Lester B. Johnson, Assistant City Attorney  
Jennifer Herman, Assistant City Attorney  
Beth Barnes, Department of Inspections



C H A T H A M C O U N T Y - S A V A N N A H

## **METROPOLITAN PLANNING COMMISSION**

*"Planning the Future - Respecting the Past"*

M E M O R A N D U M

**TO: The Mayor and Aldermen, City of Savannah**

**FROM: The Planning Commission**

**DATE: December 15, 2020**

**SUBJECT: Rezone Lynes Avenue from I-L to I-H**  
**Jane & Anthony Abbot Marital Trust et al., Owner/Agent**  
**PINs: 20632 01014, -015, -016, -017, -018, 20631 02019, -020, -028**  
**Acreage: 18.22 Acres**  
**Aldermanic District: 1 (Lanier)**  
**County Commission District: 8 (Ellis)**  
**File No. 20-005170-ZA**

**Jordan Holloway, MPC Project Planner**

### **Issue:**

A request to rezone the eight (8) subject parcels from the I-L (Light Industrial) Zoning District to the I-H (Heavy Industrial) Zoning District.

### **Background:**

This item was continued at the November 24, 2020 MPC meeting in order to receive feedback from the City Attorney.

The subject properties located along Lynes Avenue are in the I-L Zoning District and are currently undeveloped and according to the National Wetland Inventory, are all considered wetlands. These properties were rezoned during the adoption of NewZO from I-H to I-L due to the existing development pattern of the industrial park and found the most compatible Zoning District to be Light Industrial. The north end of Lynes Avenue consists of fifteen developed parcels that are industrial in nature. The subject properties are bounded by I-516 and I-16 to the east and south respectively, while the subject properties are bounded by railroad tracks and a lake to the west. The subject properties total approximately 18.22 acres within the Lynes Parkway Center.

**Facts and Findings:**

1. **Public Notice:** As required by the City of Savannah Zoning Ordinance, all property owners within 300 feet of the subject property were sent notices of the proposed rezoning on November 4, 2020. Public notice was also posted at the site. A letter of opposition has been submitted to the MPC from a neighboring property within the Lynes Parkway Center.
2. **Existing Development Pattern:** The land uses and zoning districts surrounding the subject site include:

<u>Location</u>	<u>Land Use</u>	<u>Designation</u>
North	Industrial	I-L
South	Interstate Highway	I-L
East	Interstate Highway	I-L
West	Industrial	I-L

3. **Existing I-L Zoning District:**
  - a. **Intent of the I-L District:** “The I-L district is established to provide for a wide range of research and development, light manufacturing and assembly, warehousing, and wholesaling activities as well as some support services. These uses are subject to standards intended to ensure such development is compatible with adjacent and nearby non-industrial areas. Development must be operated in a clean and quiet manner, with most activities occurring indoors, and should not be a nuisance to nearby non-industrial uses.”
  - b. **Allowed Uses:** The following uses are permitted: *Attached Chart (Attachment 1)*
  - c. **Development Standards:** *Attached Chart (Attachment 2)*
4. **Proposed I-H Zoning District:**
  - a. **Intent of the I-H District:** “The I-H district is established to provide sites

for activities which involve large-scale warehousing, processing, manufacturing facilities, major transportation terminals and waste-related facilities that have a greater impact on the surrounding area than industries found in the IL-T and I-L districts. It is the intent of this district to provide an environment for industries that is unencumbered by nearby non-industrial development.”

- b. **Allowed Uses:** *Attached Chart (Attachment 3)*
- c. **Development Standards:** *Attached Chart (Attachment 2)*
- 5. **Transportation Network:** Lynes Avenue is served by the CAT Bus Route #29 (W. Gwinnett/Cloverdale Route).
- 6. **Public Services and Facilities:** The property is served by the Chatham County – Savannah Metropolitan Police Department, City of Savannah fire protection and by City of Savannah water and sanitary sewer.
- 7. **Comprehensive Plan Land Use Element:** The Comprehensive Plan and Future Land Use Map call for these parcels to remain “Light Industrial”.

#### **ADDITIONAL REVIEW CRITERIA:**

##### ***a. Suitability and Community Need***

- I. *Whether the range of uses permitted by the proposed zoning district is more suitable than the range of uses that is permitted by the current zoning district.*

**Staff Comment:** The Petitioner has indicated proposed uses of warehouse, container storage, outdoor storage, and lay down yard. All the previously mentioned uses are permitted in the current I-L Zoning District. It is not clear to staff why the petitioner is requesting a rezoning given this information. Being that the surrounding parcels are all Light Industrial and the Future Land Use Map calls for the area to be Light Industrial, the character of the area should remain strongly linked to Light Industrial uses.

- II. *Whether the proposed zoning district addresses a specific need in the county or city.*

**Staff Comment:** The proposed zoning district does not address a specific need in the county or the city.

##### ***b. Compatibility***

- I. Whether the zoning proposal will adversely affect the existing use or usability of adjacent or nearby property.*

**Staff Comment:** The zoning proposal will not adversely affect the existing use on the subject properties as they are undeveloped. However, the zoning proposal would adversely affect the existing surrounding parcels that are developed as Light Industrial.

- II. Whether the zoning proposal is compatible with the present zoning pattern and conforming uses of nearby property and the character of the surrounding area.*

**Staff Comment:** The zoning proposal is not compatible with the present zoning pattern and the conforming uses of nearby property and character of the surrounding area. I-H Zoning District specifically states its intention has a greater impact on surrounding properties. While the Petitioner indicates that the surrounding areas are all zoned I-H, staff is of the opinion that I-16 and the train tracks to the west of the parcels create natural barriers from the I-H Zoning District and thus put a defining boundary on the area. East of I-516 is also zoned I-L and rezoning the property to I-H would not be in keeping with the character of the area and nearby uses.

- III. Whether there are other existing or changing conditions affecting the use and property which give supporting grounds for either approval or disapproval of the zoning proposal.*

**Staff Comment:** There are no existing or changing conditions affecting the use of this property which would give supporting grounds for approval.

***c. Consistency***

*Whether the zoning proposal is in conformity with the policy and intent of the Comprehensive Plan and other adopted plans, such as a redevelopment plan or small area plan.*

**Staff Comment:** The Comprehensive Plan and Future Land Use Map call for this area to remain Light Industrial. Approving the proposed zoning change to I-H would significantly alter this area and would be in blatant disregard for the Comprehensive Plan and Future Land Use Map.

***d. Reasonable Use***

*Whether the property to be affected by the zoning proposal has a reasonable use as currently zoned.*

**Staff Comment:** The subject property has a reasonable use and potential uses as it is currently zoned. All of the uses the petitioner proposed for the I-H Zoning District can be accommodated in the current I-L Zoning District.

***e. Adequate Public Services***

*Whether adequate school, public safety and emergency facilities, road, ingress and egress, parks, wastewater treatment, water supply and stormwater drainage facilities are available for the uses and densities that are permitted in the proposed zoning district.*

**Staff Comment:** Adequate school, public safety and emergency facilities, road, ingress and egress, parks, wastewater treatment, water supply and stormwater drainage facilities are available for the uses and densities that are permitted in the proposed zoning district.

***f. Proximity to a Military Base, Installation or Airport***

*In accordance with the O.C.G.A. §36-66-6, when a rezoning is proposed for property located within 3,000 feet of a military base, installation or airport, or within the 3,000-foot Clear Zone and Accident Prevention Zones I and II as prescribed in the definition of an Air Installation Compatible Use Zone that is affiliated with such base.*

**Staff Comment:** The subject site **is not** located within 3,000 feet of a military base or within the other listed zones.

**POLICY ANALYSIS:**

The current regulations and intent as laid forth for the I-L Zoning District is to allow a wide range of research and development, light manufacturing, warehousing, and wholesaling activities in a clean and quiet manner as to not be a nuisance to nearby non-industrial uses. The Petitioner has listed proposed land-uses that are already permitted in the I-L Zoning District that are compatible with the intent of the zoning ordinance. It is therefore incomprehensible to understand the intent of the rezoning application for the I-H Zoning District. The I-H Zoning District is not in keeping with the Comprehensive Plan or the Future Land Use Map and thus treating these parcels differently than the surrounding properties would be considered spot zoning.

Staff also must consider the range of all possible uses within the requested Zoning District of I-H. Several uses including “solid waste and industrial landfill facility” and “waste incinerator” are permitted in the I-H Zoning District and would be detrimental to this area and not in keeping with the surrounding character of the area.

**RECOMMENDATION:**

The Planning Commission recommends **denial** the petitioner's request to change the zoning at multiple parcels on Lynes Avenue from the I-L Zoning District to the I-H Zoning District.



**ABBOTT & ABBOTT**  
Attorneys at Law  
117 West Oglethorpe Avenue  
Savannah, GA 31401  
Telephone: (912) 233-4721

**RECEIVED**

DEC 14 2020

Metropolitan Planning Commission

December 14, 2020

To the Members of the Metropolitan Planning Commission:

This rezoning involves eight lots at the Lynes Parkway Center Industrial Park located at Gwinnett Street and Lynes Parkway. These lots total 18.22 acres. The park was developed in 1989.

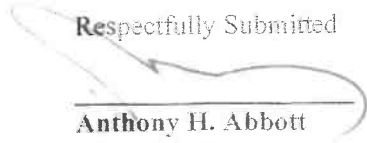
Ever since the original development the land has been zoned as heavy industrial. Apparently, during the recent city rezoning known as UZO the property was rezoned to light industrial. The owners of the property never received notice and did not consent to the rezoning. A 9.42 acre tract part of the original development was left as heavy industrial while the owners' adjacent lots were rezoned to light industrial.

The owners have received strong interest of late from several prospects to purchase the property. All of the prospects require the property to be zoned heavy industrial. The owners will be irreparably harmed if the sale does not occur due to the improper rezoning.

The action of the City of Savannah in rezoning the property without notice or consent from the owner is illegal. It is a taking without compensation or due process and a violation of equal protection in contravention of the Fifth Amendment made applicable to the States by the Fourteenth Amendment to the United States Constitution and applicable laws of the State of Georgia.

For these reasons, it is respectfully requested that the Metropolitan Planning Commission recommend the property be rezoned to its original zoning of heavy industrial.

Respectfully Submitted

  
**Anthony H. Abbott**  
Owner

C.C. R. Bates Lovett, Esq.  
(via e-mail)



SAWYER LAW GROUP, LLC  
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Savannah, GA 31401  
www.sawyerlg.com  
Phone 912.662.8611  
Fax 912.662.8616

PARICER C. MORGAN  
pmorgan@sawyerlg.com  
Direct 912.662.8614

November 23, 2020

**VIA EMAIL**

Chatham County – Savannah Metropolitan Planning Commission  
c/o Mr. Marcus Lotson  
110 East State Street  
Savannah, Georgia 31401  
lotsonm@thempc.org

Re: Lynes Avenue Proposed Rezoning / File No. 20-005170-ZA

Dear Commissioners:

We represent 8 property owners who collectively own 12 lots within the Lynes Parkway Center, with a full list of said 8 owners (the “Owners”), as well as a map depicting the lots within the Lynes Parkway Center attached hereto and incorporated herein. The Owners **strongly object** to the proposed rezoning of lots 14, 15, 16, 17, 18, 19, 20, & 28 (the “Property”) from Light Industrial (IL) to Heavy Industrial (IH). We urge the Commission to uphold the staff recommendation and recommend **denial** of the proposed rezoning.

The Commission should recommend denial of the proposed rezoning of the Property to Heavy Industrial for the following reasons:

1. The applicant does not need a rezoning to utilize the Property for its intended land uses as set forth in the application for rezoning of “warehouse and container storage and maintenance, general storage, and lay down yard.” All of these uses are permitted by the current zoning classification of Light Industrial (IL). Warehousing is permitted by right, while container storage yard and outdoor storage yard are both permitted as limited uses in Light Industrial (IL) and Heavy Industrial (IH) zones. In fact, per Section 5.4 of the Zoning Ordinance, there are only 4 uses that are permitted in Heavy Industrial (IH) that are not permitted in Light Industrial (IL): “Intensive industry, manufacturing, and processing”, “Solid waste and industrial landfill facility”, “Class 3, 4, or 5 mulch or compost processing facility”, and “Waste incinerator.” Any of these more intensive uses would dramatically and negatively impact the Owners and their existing businesses located within the Lynes Parkway Center as well as the surrounding areas, which includes Carver Heights being located just on the other side of I-16 from the Property. Based on the applicant’s own stated intended uses of the Property and the

uses currently allowed for by the Property's current zoning classification of Light Industrial (IL), there is no plausible argument justifying nor need to alter the current zoning map and allow for the possibility of unforeseen future consequences and negative impacts on the adjacent Owners and surrounding areas.

2. Heavy Industrial (IH) zoning would be inappropriate, and arguably illegal "spot zoning", for the Property, which again is comprised of only 8 lots of the 28-lot industrial office park. Furthermore, we call your attention to the attached map of the Lynes Parkway Center, with its single point of ingress or egress, as originally developed by applicant's family and approved as a subdivision. Per Section 5.17.1 of the Zoning Ordinance, the "IH district is established to provide sites for activities which involve large-scale warehousing, processing, manufacturing facilities, major transportation terminals and waste-related facilities that have a greater impact on the surrounding area than industries found in the IL-T and IL districts. **It is the intent of this district to provide an environment for industries that is unencumbered by nearby non-industrial development.**" It would be impossible for the Property, if changed to a Heavy Industrial (IH) zoning, to be unencumbered by the less intrusive adjacent land uses. It would also be contrary to the development of Lynes Parkway Center, within which the Owners purchased their lots and established their businesses over the years in reliance on the existing pattern of uses permitted by the Light Industrial (IL) zoning classification, which sets appropriate expectations as to future development by neighboring owners as well as expectations of truck traffic on the single roadway upon which all lots of the subdivision front.
3. Changing the zoning classification for the Property from Light Industrial (IL) to Heavy Industrial (IH) has the potential to greatly and negatively impact the subdivision's roadway and drainage infrastructure.
  - a. ***Lynes Avenue*** - As noted previously, the Lynes Parkway Center has one road, Lynes Avenue, which all lots within the subdivision use as ingress and egress to West Gwinnett Street. The truck traffic on the subdivision's single road by an adjoining landowner/user, Interstate Logistics Park, to the west of the subdivision, whose only access point is pursuant to an easement road that connects to Lynes Avenue, has been a strain on the Owners over the years, increasing the dust and noise to an unwelcomed nuisance level – so much so that in an effort to address certain Owners' concerns the adjoining owner paved a portion of the easement immediately adjacent to certain Owners' lots.
  - b. ***The drainage system in the development*** – as approved in the original subdivision plat, drainage easements run along the side and/or back of a number of the applicant's lots comprising the Property. Should the applicant intend for these lots to be re-zoned and then developed to be used as a single developed parcel, the drainage easements would need to be addressed as drainage is already any issue for a number of the Owners.
4. The proposed rezoning of the Property does not satisfy the review standards set forth in Section 3.5.8 of the Zoning Ordinance, being as follows:

- a. ***Suitability and Community Need*** - The range of uses currently permitted under the current zoning of the Property of Light Industrial (IL) is more suitable for the applicant's stated uses than the range of uses permitted by the proposed zoning district of Heavy Industrial (IH). As discussed above, there are only 4 additional uses permitted in a Heavy Industrial (IH) zone not permitted by a Light Industrial (IL) zone, none of which are more suitable to the applicant's stated uses. Thus, given that the applicant's stated uses are permitted in the current zoning of Light Industrial (IL), there is no basis in suitability and/or community need for changing the zoning classification to Heavy Industrial (IH).
- b. ***Compatibility*** - The proposed zoning will adversely affect the existing use and usability of adjacent property. The existing uses at Lynes Parkway Center are small warehouse / office uses for a number of businesses. The additional uses that would be allowed under Heavy Industrial (IH) zoning versus Light Industrial (IL) would be much more intrusive and generate a substantial and negative impact upon these existing businesses, and would in no way be compatible with the existing uses in the subdivision. Changing 8 of the existing lots to a Heavy Industrial (IH) zoning would not be compatible with the present zoning patterns or the present conditions at the subdivision.
- c. ***Consistency*** - The Future Land Use Map designates the proposed area as Light Industrial (IL), and the proposed zoning would not be in conformity with that plan. As set forth in the Heavy Industrial (IH) definition, the intention is for Heavy Industrial (IH) zoned properties to be unencumbered by adjacent uses and free to have much more intrusive uses without concern of the impact on adjacent owners. Such intention would be unattainable here due to the existing, immediately adjacent businesses and the nearby Carver Heights community – both of which would suffer greatly from the expanded uses allowed under Heavy Industrial (IH) zoning. Such rezoning might make sense if the entirety of the subdivision was being rezoned and such rezoning could be shown to not impact Carver Heights, but without those factors such rezoning is inconsistent with the adjoining lots in the subdivision and the surrounding area and appears to be “spot zoning” for the benefit of the applicant and to the detriment of surrounding owners and communities.
- d. ***Reasonable Use*** - The Property has more than sufficient reasonable uses as currently zoned. As discussed, the applicant's desired land uses are permitted under the Property's current zoning classification of Light Industrial (IL). There is no zoning change necessary.
- e. ***Adequate Public Services*** – As noted earlier, Lynes Parkway Center has one point of ingress and egress from West Gwinnett Street. Currently, existing truck traffic running to and from the Interstate Logistics Park located to the west of the subdivision has generated a number of problems with excessive dust and runoff that has been minimally addressed through additional paving and sitework, but continues to remain a problem for the Owners. Additionally, a number of the lots comprising the Property submitted for rezoning are subject to an existing stormwater drainage easement running from the subdivision to a collection pond. A change in zoning to Heavy Industrial (IH) would substantially increase

the strain on Lynes Avenue and require a redesign of the stormwater drainage easements as originally created and dedicated for the use of all owners in the subdivision.

Based upon the sound reasoning set forth above, we respectfully ask you to uphold the staff review of this application and recommend denial to the Mayor and Aldermen of the City of Savannah of the applicant's proposed rezoning of the Property to Heavy Industrial (IH). The proposed rezoning is unnecessary, inappropriate, and does not meet the requisite standards set forth in the Zoning Ordinance for such a change. Thank you for your attention to this matter.

Sincerely,

SAWYER LAW GROUP, LLC



Parker C. Morgan

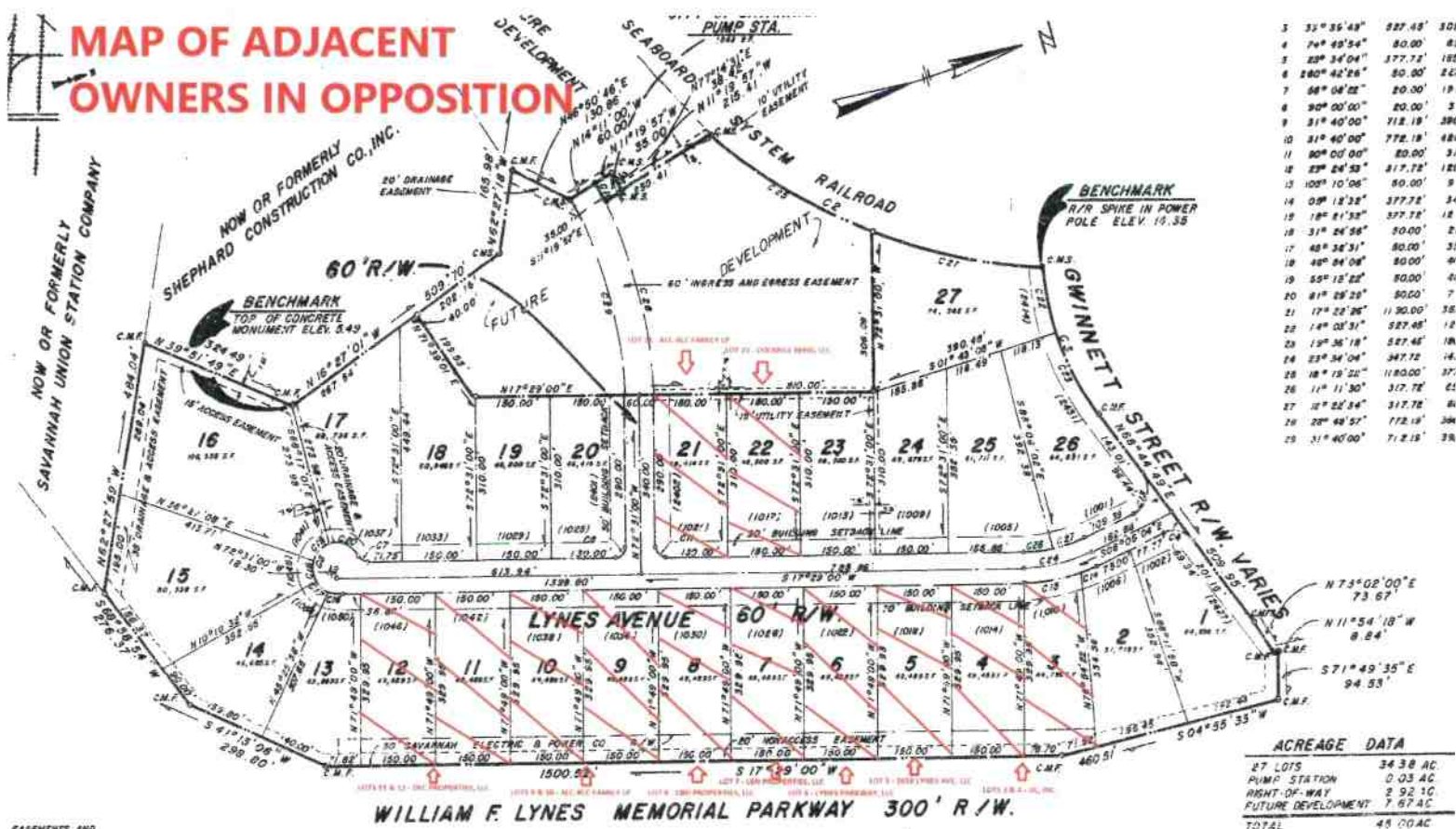
PCM/tf

*Enclosure*

**SCHEDULE OF ADJACENT PROPERTY OWNERS OPPOSED TO REZONING**

<u>OWNER</u>	<u>ADDRESS</u>	<u>LOT(S)</u>
JJL, Inc.	1010 Lynes Avenue	Lots 3 & 4
1018 Lynes Ave, LLC	1018 Lynes Avenue	Lot 5
Lynes Parkway, LLC	1022 Lynes Avenue	Lot 6
LBN Properties, LLC	1026 Lynes Avenue	Lot 7
CBO Properties, LLC	1030 Lynes Avenue	Lot 8
ALC-RLC Family LP	1034 Lynes Avenue	Lot 9
ALC-RLC Family LP	1038 Lynes Avenue	Lot 10
DFC Properties, LLC	1042 Lynes Avenue	Lots 11 & 12
ALC-RLC Family LP	1021 Lynes Avenue	Lot 21
Cockrill Bend, LLC	1017 Lynes Avenue	Lot 22

# MAP OF ADJACENT OWNERS IN OPPOSITION





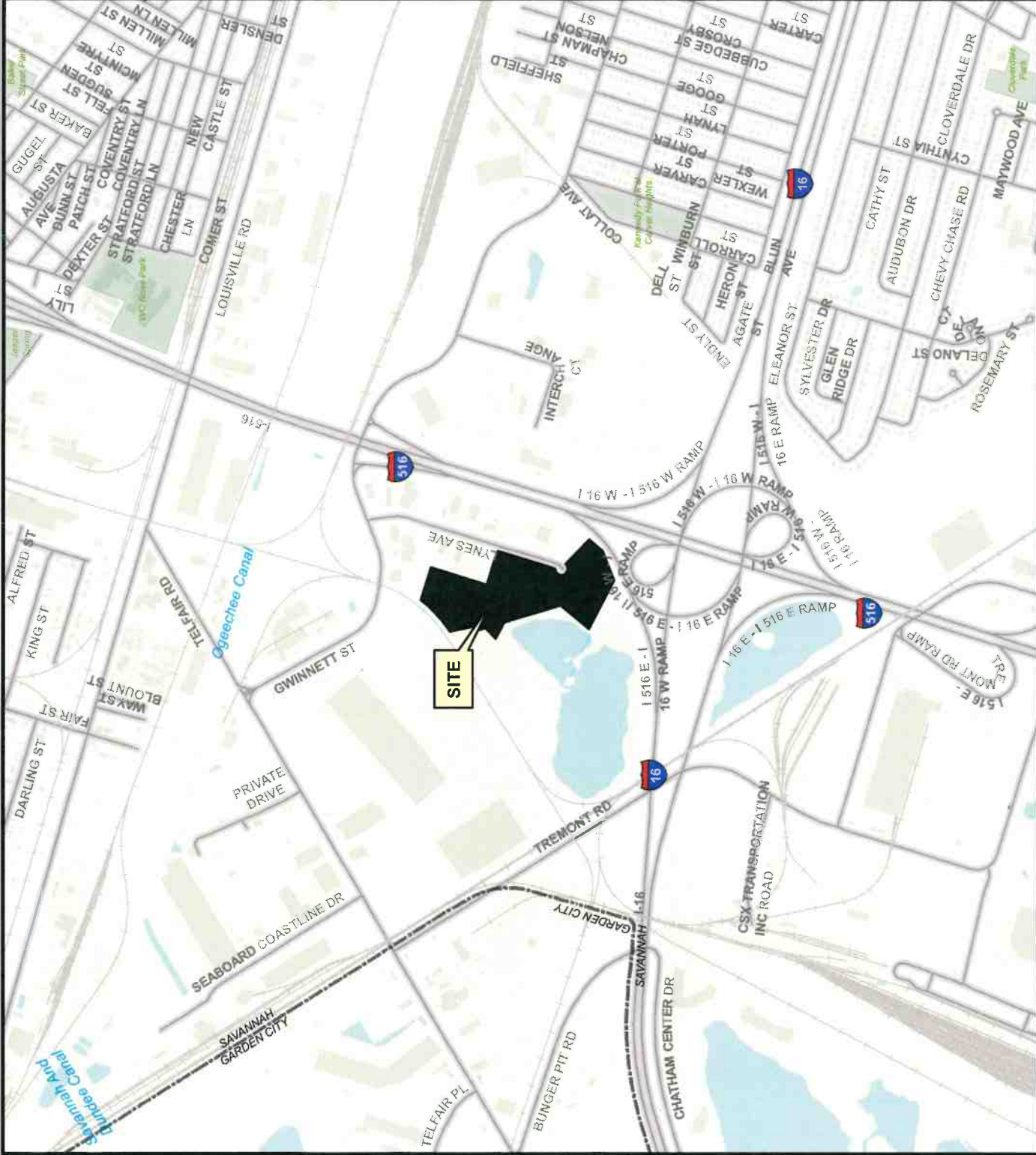
# VICINITY MAP

20-005170-ZA  
Lynes Ave. (8 Parcels)  
Savannah, Ga  
Aldermanic District: 1 (Lanier)  
Commission District: 8 (Ellis)  
Neighborhood:-  
PIN(s): See Map

Date: 10/23/2020



CHATHAM COUNTY - SAVANNAH  
METROPOLITAN PLANNING COMMISSION  
110 E. STATE ST. SAVANNAH, GA 31412-8246 PHONE 912-651-1440



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.



1 inch = 1,200 feet

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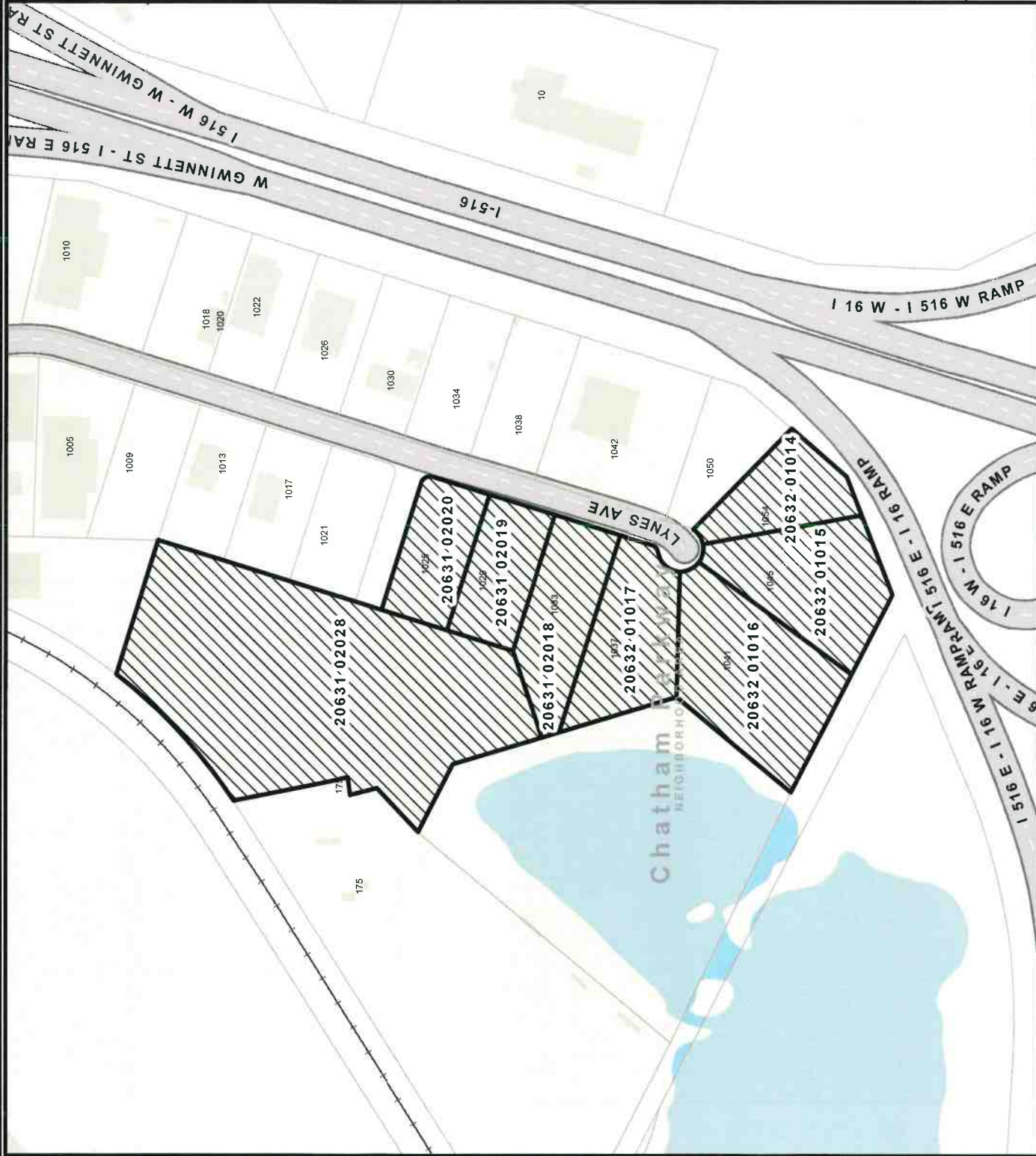
# TAX MAP

20-005170-ZA  
 Lynes Ave. (8 Parcels)  
 Savannah, Ga  
 Aldermanic District: 1 (Lanier)  
 Commission District: 8 (Ellis)  
 Neighborhood:-  
 PIN(s): See Map

Date: 10/23/2020



CHATHAM COUNTY - SAVANNAH  
**METROPOLITAN PLANNING COMMISSION**  
 110 E. STATE ST. SAVANNAH, GA 31412-3246 PHONE 912.651-1440



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1 inch = 300 feet

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# ZONING MAP

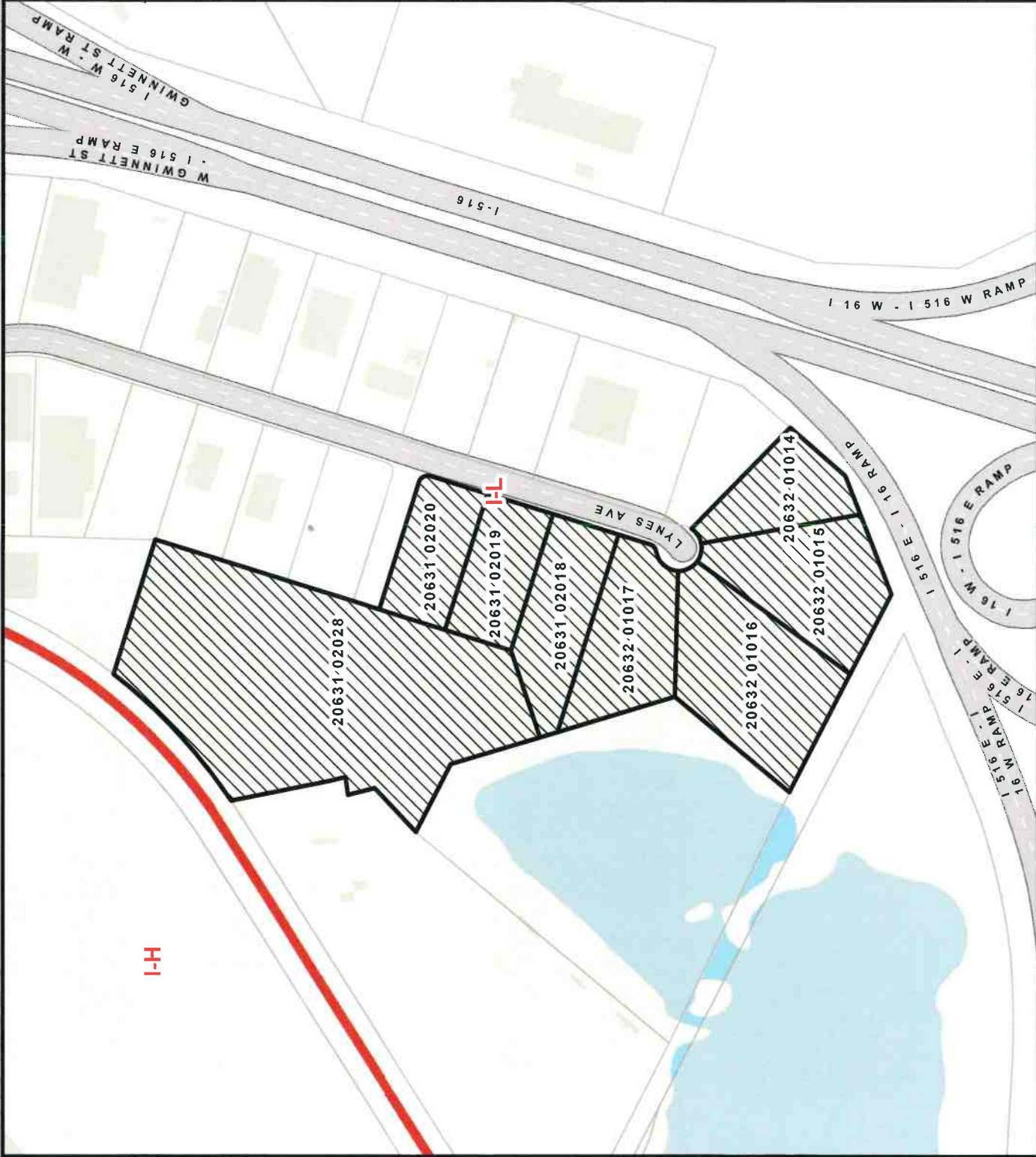
20-005170-ZA  
Lynes Ave. (8 Parcels)  
Savannah, Ga  
Aldermanic District: 1 (Lanier)  
Commission District: 8 (Ellis)  
Neighborhood:-  
PIN(s): See Map  
  
Current property zoning(s) is primarily  
I-L  
Proposed property zoning:  
I-H

City of Savannah NewZoo Zoning When Applicable

Date: 10/23/2020



CHATHAM COUNTY - SAVANNAH  
**METROPOLITAN PLANNING COMMISSION**  
110 E. STATE ST. SAVANNAH, GA 31412-8246 PHONE 912.651.1440



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1 inch = 300 feet

D



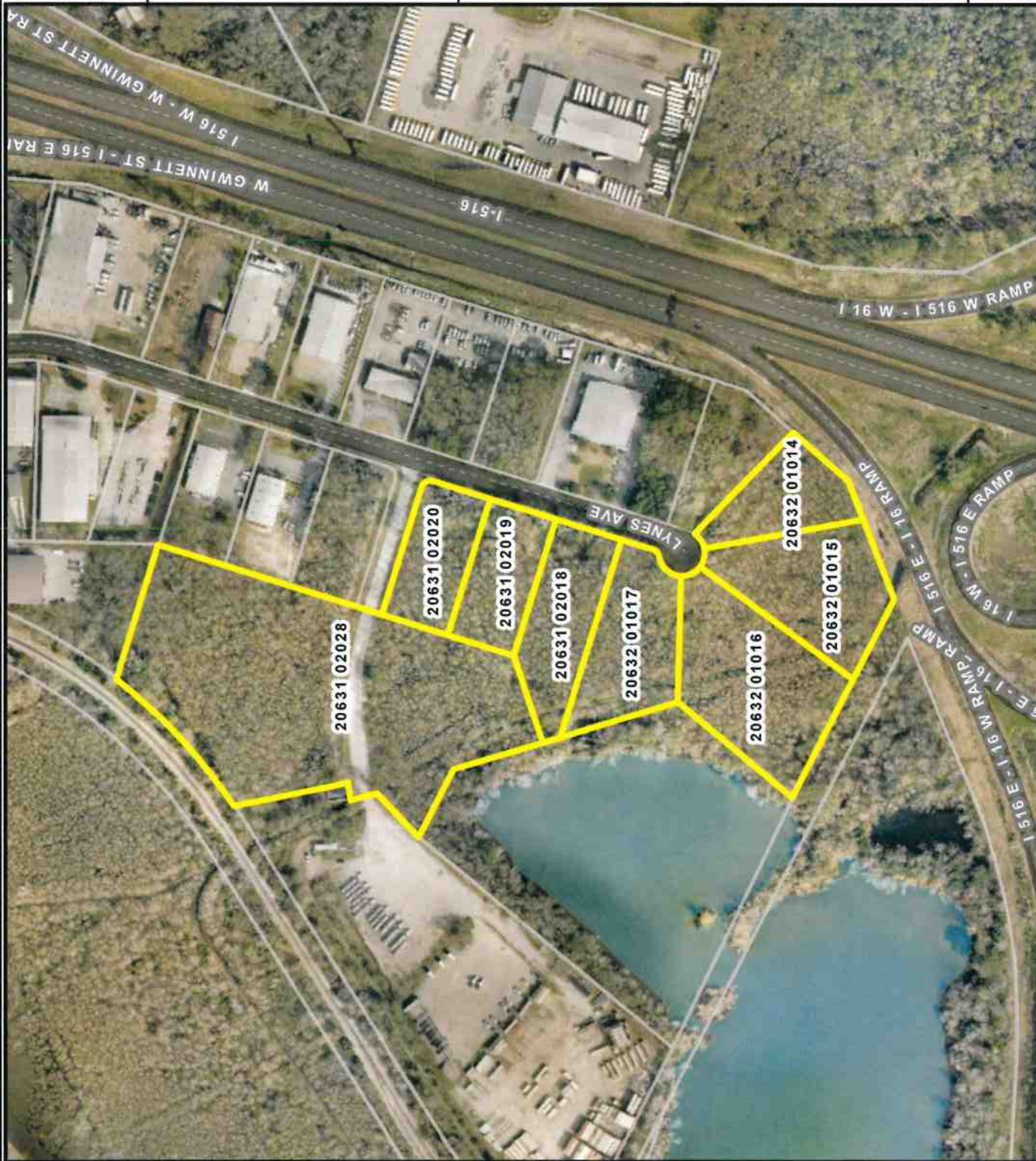
# AERIAL MAP

20-005170-ZA  
Lynes Ave. (8 Parcels)  
Savannah, Ga  
Aldermanic District: 1 (Lanier)  
Commission District: 8 (Ellis)  
Neighborhood:-  
PIN(s): See Map

Date: 10/23/2020



CHATHAM COUNTY - SAVANNAH  
**METROPOLITAN PLANNING COMMISSION**  
110 E. STATE ST. SAVANNAH, GA 31402-3246 PHONE 912-657-1440



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1 inch = 300 feet

D



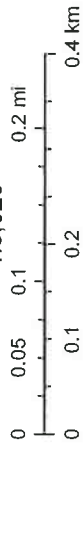
# SAGIS iMap Viewer



November 20, 2020

- Local Roads
- Parcel Weekly Update
- Wetlands - NWI
  - <Null>
  - Estuarine and Marine Deepwater
  - Estuarine and Marine Wetland
  - Freshwater Emergent Wetland
  - Freshwater Forested/Shrub Wetland

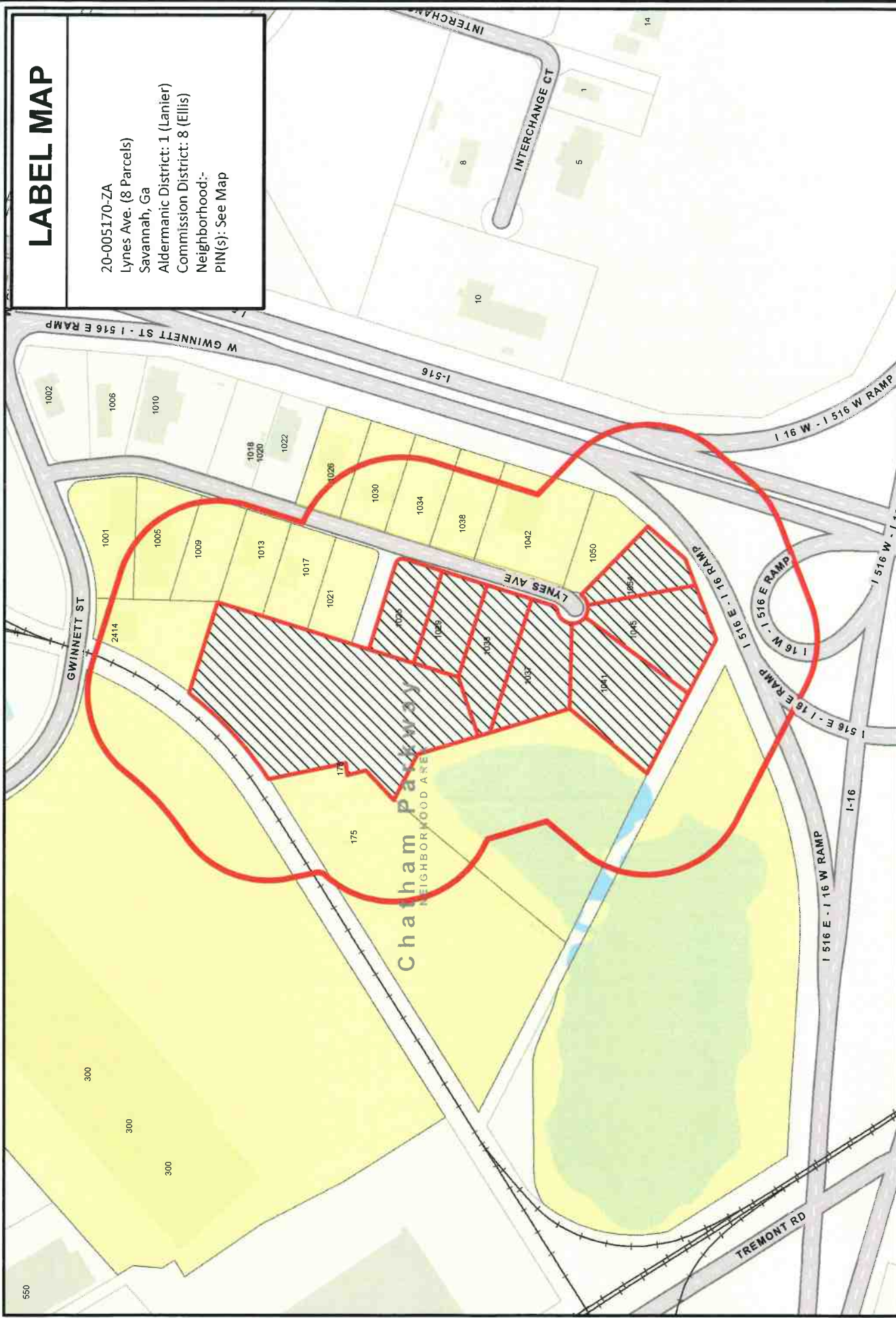
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# LABEL MAP

20-005170-ZA  
Lynes Ave. (8 Parcels)  
Savannah, Ga  
Aldermanic District: 1 (Lanier)  
Commission District: 8 (Ellis)  
Neighborhood:-  
PIN(s): See Map



CHATHAM COUNTY - SAVANNAH  
METROPOLITAN PLANNING COMMISSION  
110 E. STATE ST. SAVANNAH, GA 31412-8246 PHONE 912-651-1440



1 inch = 400 feet



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# FUTURE LAND USE

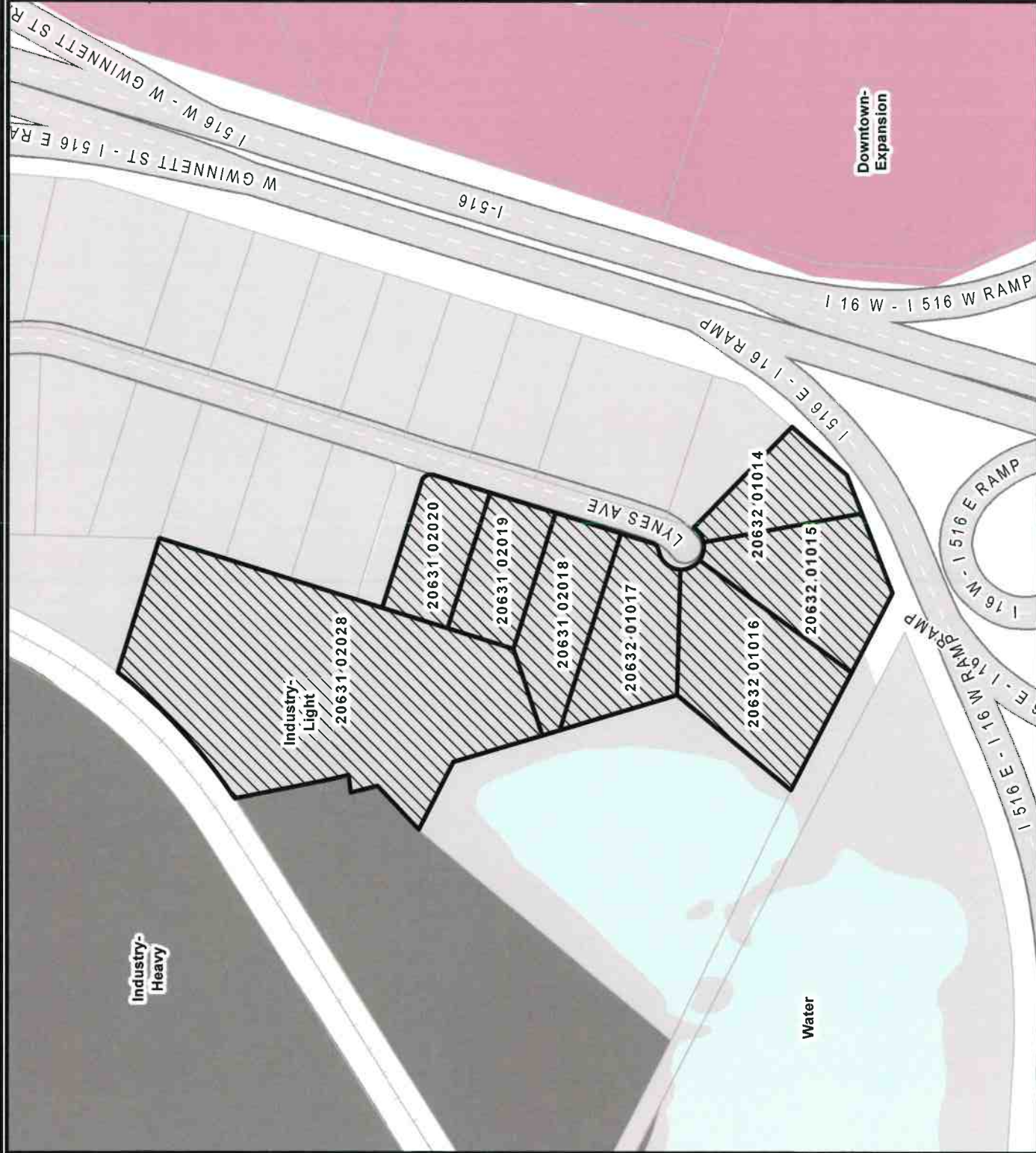
20-005170-ZA  
Lynes Ave. (8 Parcels)  
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Aldermanic District: 1 (Lanier)  
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Neighborhood:-  
PIN(s): See Map

Downtown- Expansion  
Industry- Light  
Industry- Heavy

Date: 10/23/2020



CHATHAM COUNTY - SAVANNAH  
**METROPOLITAN PLANNING COMMISSION**  
110 E. STATE ST. SAVANNAH, GA 31412-3246 PHONE 912.651-1440



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D





