



# ATTACHMENT 4

## PLAN REVIEW COMMENTS FOR COFA-04-24-019080

Town of Bluffton  
Department of Growth Management  
20 Bridge Street P.O. Box 386 Bluffton, South Carolina 29910  
Telephone 843-706-4522  
OLD TOWN

**Plan Type:** Historic District **Apply Date:** 04/08/2024  
**Plan Status:** Active **Plan Address:** 113 Bridge Street  
BLUFFTON, SC 29910  
**Case Manager:** Glen Umberger **Plan PIN #:** R610 039 00A 0192 0000  
**Plan Description:** The Tison-Derst Cottage is a contributing structure and is one of several structures located at 113 Bridge Street. The Owner is allowing this application on behalf of prospective owners Chris and Christine Murphy.  
  
The application is a request to relocate the Tison-Derst Cottage approximately 339'-0" to the North and 13'-6" to the East. The cottage stays on 113 Bride Street and would maintain the same orientation to the river.

### Staff Review (HD)

**Submission #: 1**      Recieved: 04/08/2024      Completed: 04/30/2024

Reviewing Dept.	Complete Date	Reviewer	Status
Beaufort Jasper Water and Sewer Review	05/01/2024	Matthew Michaels	Not Required
Watershed Management Review	04/29/2024	Samantha Crotty	Not Required

**Comments:**  
Comments will be provided at time of Stormwater Permit submittal/Building Permit submittal.

Growth Management Dept Review (HD)      05/01/2024      Glen Umberger      Approved with Conditions

**Comments:**

## ATTACHMENT 4

1. The proposal to relocate the Contributing Resource to the northern end of the lot will require two (2) separate Certificates of Appropriateness-HD to be approved by the HPC: one COFA-HD to relocate the structure and one COFA-HD to place the Resource in its new location (Applications Manual). Approval of the second COFA-HD will require a variance from the BZA since it will not comply with zoning requirements set forth in Article 5 of the UDO and the BZA will need to determine if there is a hardship before the Contributing Resource can be moved. Furthermore, if the Contributing Resource is relocated and then reclassified as a “carriage house,” there will be no principal structure on the lot, which does not conform to zoning requirements.
2. If there is no hardship, the Contributing Resource cannot be moved to the proposed location on the current lot; it would need to be moved to another location that is in compliance with the UDO.
3. Proposed rehabilitation work will need to comply with the Secretary of Interior’s Standards for Treatment of Historic Properties (Rehabilitation) and Guidelines for Rehabilitating Historic Buildings (UDO 3.18.3.). The current proposal seeks to relocate the Contributing Resource which will destroy the historic relationship between the Resource and the historic landscape features, including the relationship between the Resource and the May River.
4. Provide additional information on the location of the materials which are proposed to be replaced with new material on the Contributing Resource after proposed partial demolition and relocation and during rehabilitation. While there may be minor areas where unexpected changes may need to be made once the permit has been approved, the majority of the areas should be identified prior to the approval of a Certificate of Appropriateness to ensure it is in compliance with the criteria found in Section 3.18 of the UDO (UDO 3.18.3.A.7.).
5. Provide additional information as to how the historic integrity of the Resource shall be maintained, which shall be to the greatest extent possible, including, but not limited to, details on the new foundation which shall match the original foundation in height, design, and materials (UDO 3.18.3.A.9.).
6. The proposed rehabilitation is not consistent with the principles set forth in the Old Town Master Plan, specifically that “the historic structures scattered throughout [the District] should be protected and enhanced.” In this instance, the proposed relocation does not protect, nor will it enhance the structure as relocation will cause the loss of historic integrity (UDO 3.18.3.B.).
7. Since the relocation of any Contributing Resource is detrimental to the integrity of the Old Town Bluffton Historic District, and in this instance, the Bluffton Historic District (listed in the National Register of Historic Places) as significance of the resource is embodied in location, context, and setting, and the relocation of the Resource may destroy the relationship between the Resource and its surroundings and may create a false sense of historic development, relocation of a Contributing Resource shall not be permitted except in extraordinary circumstances. Accordingly, please provide additional information as to which extraordinary circumstances exist which require relocation of the Contributing Resource (UDO 3.18.4.B. and UDO 3.18.4.B.1.a.).
8. Provide additional information on alternatives to relocation that were explored and why they are not feasible (UDO 3.18.4.B.1.c).
9. Provide additional information through a report prepared by a State of South Carolina registered professional structural engineer with demonstrated experience in historic preservation that the structure can be relocated without irreparable harm, supported by findings (UDO 3.18.4.B.1.e.).
10. Provide additional information as to the method of the proposed relocation to ensure that it is relocated without irreparable harm (UDO 3.18.4.B.1.e).
11. In the Riverfront Edge zoning district, only two carriages houses may be built per one primary structure and the carriage houses must be placed between the primary structure and the street (oriented towards the River). Since there are currently two accessory structures on the lot, one must be demolished before the Contributing Resource could be relocated and potentially reclassified as a “carriage house” (UDO 5.15.5.E).
12. In addition, the proposed 1300 SF “rehabilitated” Contributing Resource is significantly larger than the maximum allowable footprint for a Carriage House (800 SF each) and will require a variance (UDO 5.15.8.F.).

HPRC Review

05/01/2024

Glen Umberger

Approved with Conditions

**Comments:**

The applicants have provided no arguments as to what reasonable hardship exists that would require the structure needs to be removed.

The relocation of the cottage 339'-0" away from the water is inconsistent with the spirit of the historic district in the UDO per the criteria provide under 3.18.3:

3.18.3.A Consistency with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings;

The Secretary of the Interior's Standards for Rehabilitation recommends "Retaining the historic relationship between buildings and the landscape." It identifies "Removing or relocating buildings or landscape features thus destroying the historic relationship between buildings and the landscape" as a Not Recommended action. Relocating the historic waterfront structure away from the waterfront to the street is inconsistent with the Secretary of Interior's Standards for Rehabilitation.

3.18.3.B. Consistency with the principles set forth in the Old Town Bluffton Master Plan;

The Old Town Master Plan states "The built environment, in particular the historic structures scattered throughout Old Town, should be protected and enhanced." As part of its policy recommendations and regulatory changes it calls for the town to "provide policy and guidelines the adaptive reuse of buildings that have become functionally or economically obsolete." It does not call for the relocation of such properties.

3.18.3.E. Preservation of the existing building's historic character and architecture;

The structure is a historic waterfront structure on the top edge of the bluff along the May River and is being proposed to be relocated adjacent to the street. This does not preserve the structure in its appropriate context.

3.18.3.F. The historic, architectural, and aesthetic features of the resource including the extent to which its alteration or removal would be detrimental to the public interest;

It is in the interest of the public to maintain the character of the historic waterfront as part of the National Register Historic District. Relocation of this structure away from the bluff is detrimental to this public interest.

Transportation Department  
Review - HD

04/09/2024

Megan James

Approved

## Comments:

No comments