



CITY OF SAVANNAH

HISTORIC PRESERVATION COMMISSION

REQUEST FOR CERTIFICATE OF APPROPRIATENESS

Petitioner: Custom Building Developments, Deidrick Cody

MPC File No.: 26-002125-COA

Address: 106 West 31st Street

PIN: 20066 07008

Zoning: TN-2

Staff Reviewer: Caitlin Chamberlain

Date: May 27, 2026

NATURE OF REQUEST:

The applicant is requesting approval for rehabilitation and alterations for the property located at 106 West 31st Street. The scope of work includes 450 square feet of siding replacement, the repair of four windows, and replace a front porch beam due to rot by water damage.

CONTEXT/SURROUNDING AREA:

106 West 31st Street was built in 1913 and is a contributing resource within the Thomas Square-Streetcar National Register Historic District and the local Streetcar Historic District. It is next to a vacant lot which makes it highly visible from the corner of Whitaker and West 31st Streets. At some point, the house was covered in asbestos shingles. There are portions of this that have fallen off, exposing at least some of the original clapboard siding beneath.



FINDINGS:

The following standards from the Sec 7.11 - Streetcar Historic District Ordinance apply:

Secretary of the Interior's Standards and Guidelines for Rehabilitation. Material changes to contributing resources and resources that are eligible for listing as contributing shall be evaluated by use of the current edition of the Secretary of the Interior's Standards and

Guidelines for Rehabilitation as published by the U.S. Department of the Interior. In considering proposals for alterations to contributing resources, the documented original design of the resource may be considered.

Secretary of the Interior's Standards 2– Historic Character. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The work being proposed is focused specifically on areas where there is damage that needs to be either repaired or replaced. This is aligned with maintaining the historic character of the building, though it was compromised when the asbestos shingles were installed.

Secretary of the Interior's Standards 4– Historic Changes. *Most properties change over time; those changes to a property that have acquired historic significance in their own right shall be retained and preserved.*

Asbestos shingles are indicative of a time period but have not acquired historical significance with regard to this building from 1913.

Secretary of the Interior's Standards 5– Distinctive Features. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*

There are requests to replace some rotted wood on a front porch beam, to repair rotted wood on four windows which will help maintain the distinctive features of the property.

Secretary of the Interior's Standards 6– Deteriorated Features. *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

The standard appears to be met but staff requests clearer photos of the four windows proposed for repair to assess the extent of the damage to just these four windows and what exactly is proposed in terms of the repair work. Some of the asbestos shingles have fallen off and rather than remove all of them, there is a proposal to replace with a fiber cement version to match. Staff finds in this case, which could be permissible but would like to see a material sample to evaluate compared to the existing siding. This is all proposed to be painted once completed. The porch beam replacement with in-kind wood meets the standard.

Visual Compatibility Criteria. *To maintain the special character of the Streetcar Historic District as identified in the architectural survey and visual analysis, new construction and any material change in appearance shall be consistent with the standards, criteria and guidelines developed for the district. The applicable criteria below shall be used to assess new construction and material changes. These criteria shall not be the basis for appeal to any board, commission or administrator described in this Ordinance, or to the Mayor and Aldermen.*

Materials. *The relationship of materials and textures of the proposed building or structure shall be visually compatible with the contributing buildings and structures to which it is visually related.*

Overall, the repair work is proposed to be undertaken with in-kind materials where replacement is necessary. As mentioned, staff requests more information.

Streetcar Historic District Design Standards.

New Construction, Additions, and Alterations. The intent of these standards is to ensure appropriate new construction, additions, and alterations within the Streetcar Historic District. They are not intended to promote copies of the architectural designs of the past, but to encourage contemporary designs that protect and complement existing contributing resources. They are further intended to protect the historic integrity of the contributing resource.

The following design standards shall apply to new construction, additions, alterations to contributing and non-contributing resources, and site alterations, unless otherwise specified. Though certain building materials are prescribed below, the Historic Preservation Commission may approve alternative materials that are not listed as prohibited upon a showing by the applicant that the material or product is visually compatible with historic building materials and has performed satisfactorily in the local climate.

Exterior walls, Alterations to contributing resources. *The intent of these standards is to ensure that exterior building walls reflect and complement the traditional materials and construction techniques of the district's architecture.*

Exterior walls shall be repaired rather than replaced, provided however, if the degree of degradation does not allow repair, the degradation shall be photographically documented and verified by the Planning Director and the replacement wall shall be of the same materials and configuration as the original wall.

If the original wall material and/or configuration is unknown, the new wall material and configuration shall be based on historic context.

There are various areas on the building where the asbestos shingles have either fallen off or have deteriorated. Due to the hazardous nature of asbestos, it would not be possible or advisable to install replacement asbestos, hence the request for a replacement that is close with fiber cement. This is typically a prohibited material but in this unusual circumstance it may be the most sensible option to spot treat areas where the shingles must be replaced.

Prohibited materials, Exterior walls, Alterations to contributing resources. *Vinyl siding, aluminum siding, rolled asphalt, precast concrete panels, fiber cement wood siding, EIFS, one-part stucco over insulation and/or wood or metal framing, and T-111.*

Fiber cement is a prohibited material on historic buildings. However, staff finds it may be something that could be supported in lieu of seeking out asbestos shingles, but also requests information on whether there is a product made of wood that would serve the same purpose and have the same look that once painted, will blend in with the existing shingles.

Windows, Alterations to contributing resources.

Windows shall be repaired rather than replaced, provided however, if the degree of degradation does not allow repair, the degradation of each window shall be photographically documented and verified by the Planning Director, and the new window shall be of the same materials and configuration as the original (including single-glazed and true-divided lights, when appropriate).

The applicant proposes to repair four windows on the side of the building that faces Whitaker. The work includes replacing 1x6 trim around windows, removing window sashes, and replacing in-kind with the same wood. They will then be primed and painted to match the rest of the windows on the building. Staff requests detailed photographs showing the extent of the damage for each window.

Porches, Stoops, Balconies and Decks, Alterations to contributing resources.

Porches shall be repaired rather than replaced, provided however, if the degree of degradation does not allow repair, the degradation shall be photographically documented and verified by the Planning Director, and the new porch materials and configuration shall be of the same material and configuration as the original.

A damaged wood beam is proposed to be replaced in kind with wood. The standard is met.

STAFF RECOMMENDATION:

Continue the rehabilitation and alterations request for the property located at 106 West 31st Street to the June 24, 2026, Historic Preservation Commission Meeting to allow the applicant time to address the following:

- 1. Provide clear photographs of each window proposed for repair and provide more details about the repair work per window.**
- 2. Explore options for wood instead of fiber cement for the replacement of missing and damaged asbestos shingles. If there is no option, a sample of the fiber cement must be provided to present at the next meeting, for analysis and determination of next steps.**

MW: CC

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