CITY OF SAVANNAH
HISTORIC PRESERVATION COMMISSION

REQUEST FOR CERTIFICATE OF APPROPRIATENESS

Petitioner:	**Keith A. Mincey**
MPC File No.:	**26-004809-COA**
Address:	**404 East 39th Street**
PIN:	**20073 27020**
Zoning:	**TR-1**
Staff Reviewer:	**Alexander Merced**
Date:	**October 28, 2026**

NATURE OF REQUEST:
This is an after-the-fact application to rebuild the front steps for the house at 404 East 39th Street. The previous steps were removed because they were a safety hazard due to severe deterioration that led to a split down the middle, and the applicant was not aware of the COA process. No other aspects of the porch will be touched.

CONTEXT/SURROUNDING AREA:
The building was constructed in 1918 and is a contributing resource within the Thomas Square-Streetcar National Register Historic District and the local Streetcar Historic District. It sits on the north side of East 39th Street and is surrounded by mostly contributing structures.

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 previous steps were heavily deteriorated, and the new one will be made of the same concrete material in the same configuration, maintaining the historic character. The standard is met.

> > ***Secretary of the Interior's Standards 3– Physical Record.*** *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false*

sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

There will be no conjectural features added, as the new steps will be made of the same material and configuration as the previous steps. The standard is met.

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.*

The same concrete material will be used as the previous steps, which is compatible with the house itself and with surrounding contributing structures, many of which also have concrete steps. The criterion is met.

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.

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.

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

As noted, the previous steps were concrete, and the new ones will be made in kind and in the same configuration. The above standards are met.

STAFF RECOMMENDATION:

Approve the after-the-fact removal and subsequent new front steps at 404 East 39th Street as requested because the proposed work is visually compatible and meets the standards.

MW: CC: APM

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.