



S A V A N N A H H I S T O R I C D I S T R I C T
B O A R D O F R E V I E W

REQUEST FOR CERTIFICATE OF APPROPRIATENESS

Petitioner: Rueben Ramos
MPC File No.: 26-003204-COA
Address: 24 East Liberty #11
PIN: 20015 29038
Zoning: D-CBD
Staff Reviewer: Jodie Brown, AICP
Date: August 12, 2026

NATURE OF REQUEST:

The applicant is requesting approval for After-the-Fact replacement windows. They have also submitted for a Special Exception to keep the already-installed Andersen Fibrex windows from the Andersen 100 Series.

CONTEXT/SURROUNDING AREA:

The subject building is located at the northwest corner of Liberty and Drayton Streets in the Derenne Ward. Constructed in the Beaux Arts style in 1924, the building is 8 stories. The building was designed in a "U" shape with a stone-like façade on the first floor and brick on the upper floors. The parapet has a fanciful design topped by dentil molding and a decorative crown. The building features symmetrically placed 1/1 double hung windows and columns of balconies on each level above the ground floor.

The subject building is listed as a contributing resource within the National Historic Landmark District and the local Savannah Downtown Historic District.

FINDINGS:

The following standards from §3.12 Special Exceptions apply:

Special Exceptions.

Review by Savannah Downtown Historic District Board of Review. Special Exceptions (as listed below) for the Savannah Downtown Historic Overlay District shall be considered by the Savannah Downtown Historic Board of Review.

Applicable Special Exceptions.

To adjust Preservation and Design Standards for local historic districts as follows:

Secs. 7.8.8, 7.9.8, and 7.11.8 Secretary of the Interior's Standards and Guidelines for Rehabilitation.

Secs. 7.8.10, 7.9.10, and 7.11.10 Design Standards.

The applicant applied for one Special Exception:

- §7.8.10.h.2.b.i—"Window casings and sashes shall be made of metal, wood or clad wood material." It should be noted that the applicant included the incorrect code section, §7.8.10.h.2.b.i is for "New construction, alterations to non-contributing resources, and additions." The correct code section is §7.8.10.h.2.a.i which is specifically for "Alterations to contributing resources." This section (§7.8.10.h.2.a.i) states, "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)."

Review Criteria for Special Exceptions. When reviewing a special exception request, a finding shall be made by the Savannah Downtown Historic District Board of Review for each of the criteria listed below.

Whether the use for which the special exception is being considered would be located, operated and maintained in a manner in conformance with the goals, policies, and objectives of the Comprehensive Plan and the provisions of this Ordinance.

Typically, this Special Exception would fall within the following goal and objectives.

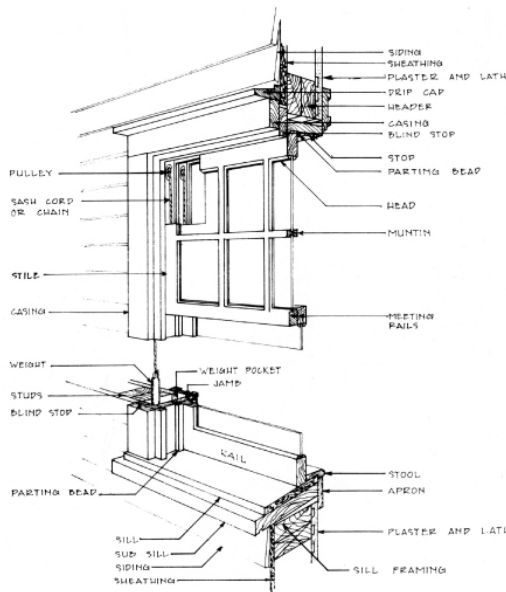
- Quality of Life
 - Goal 4, "Identify and address climate resiliency strategies and incorporate them into a climate resiliency plan for unincorporated Chatham County and Savannah's historic and cultural resources."
 - Objective, "Identify and address strategies for increasing the resiliency of historic and cultural resources."
 - Objective, "Establish a clear process for the protection and management of historic resources in the result of a natural disaster."

As stated under Goal 4, "Historic preservation itself, through adaptive reuse and retention of historic materials, is a critical component of sustainable growth and development." Typically, applicants present proposed work to staff prior to submitting for a COA. In this instance, the applicant opted to complete the work without the benefit of a COA. Obtaining any significant discussion on appropriate work on the windows or appropriate window replacements with staff and the HDBR was disregarded. The Pre-Application Meeting and the COA processes were both designed to respond to the Objectives noted above. The project does not meet the Goals and Objectives of the City's and County's Comprehensive Plan; this standard has not been met.

Whether the special exception would not be detrimental to the public interest, health, safety, welfare, function, and appearance of the adjacent uses or general vicinity.

The applicant stated that the historic windows had deteriorated beyond repair and the replacement was necessary to preserve the integrity and appearance of the building. They were replaced with Anderson Fibrex from the Anderson 100 Series in the existing openings. The new windows replicate the operation and muntin pattern present in the historic windows.

Since the windows were replaced without the benefit of a COA, they could not be evaluated on issues related to health and safety. The windows are consistent with the function of the original



unit, but they are detrimental to the public interest, welfare, and appearance of the adjacent uses or general vicinity. As a National Historic Landmark District, it is important that contributing properties maintain their historical integrity. The Secretary of the Interior's Standards and the City of Savannah code which address repairing or replacing in-kind, are designed to protect the integrity of contributing buildings. While protecting the integrity of the buildings by reviewing the windows may seem minor, there is a cumulative impact that should be taken into account. At some point, the cumulative changes have/will negatively impact the historic character of the building and the district. These cumulative changes will, in turn, negatively impact the heritage tourism that brings approximately 12.9 million visitors annually. Ultimately, the cumulative changes impact the public interest with the

disintegration of the National Historic Landmark district and the welfare as heritage tourism supports roughly 27,000 local jobs.

As it relates to appearance, the windows in question are located on the first floor along Liberty Street and within the main entrance courtyard for the building. They are highly visible. Construction of wood windows is fairly simple and contains (among other items) rails, stiles, casings and sills. The joints are typically at corners and rails and stiles are generally wider creating a substantial look. They are designed to be disassembled to allow for repair or replacement of the individual components. The Andersen Fibrex window cannot be taken apart for repair, but it has a number of visible joints along the length of the rail and what appears to be weep holes.

The Andersen Fibrex window has slimmer profiles as seen in these comparison photos (see below). The photo on the left is a neighboring original window and the window on the right



is a window in Unit 11, both along Liberty Street. To aid for measurement purposes, staff used a cell phone to show the differences. On the left (historic), the phone is placed on the wood sill and clearly shows the bulky wood components. On the right (new), the phone is placed on the stone sill clearly showing a slimmer profile.

Based on this information, staff believes that the Andersen Fibrex windows do not meet the requirements for a Special Exception. They are detrimental to the public interest, welfare, and appearance of the adjacent uses or general vicinity. They were replaced prior to evaluating them for the health and safety aspects and consistent with the function aspect. This standard has not been met.

Additional Conditions, Restrictions and Safeguards. The Savannah Downtown Historic District Board of Review may include conditions, restrictions or limitations as part of the approval in order to protect public health, safety, and welfare. When a special exception is approved with conditions, those conditions shall run with the land and shall be binding on the original applicant as well as any successor.

Staff does not have any additional conditions related to the Special Exception, as staff is recommending denial.

Time Limitations for Approved Special Conditions. Approval of a special exception pursuant to the provisions of this Ordinance shall become null and void unless the following is completed in the time period specified:

For any special exception that would not require a building permit, the special exception shall be acted upon within one (1) year from when the special exception was granted; or

For any special exception that would require a building permit, the related building permit shall have been issued and have remained continuously valid thereafter within two (2) years from the date the special exception was granted.

The following standards from §7.8 - Savannah Downtown 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 windows in question are located on the first floor along Liberty Street and within the main entrance courtyard for the building. They are highly visible. Construction of wood windows is fairly simple and contains (among other items) rails, stiles, casings and sills. The joints are typically at corners and rails and stiles are generally wider creating a substantial look. They are designed to be disassembled to allow for repair or replacement of the individual components. The Andersen Fibrex window cannot be taken apart, but it has a number of visible joints along the length of the rail and what appear to be weep holes. The Andersen Fibrex window has slimmer profiles. The various parts (parting bead, rail, etc.) are less pronounced, creating a pale facsimile of the historic window. The proposed work is not consistent with Standard 2.

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 applicant provided limited pictures of the condition of the windows prior to replacement. It is also not clear that they were evaluated for repair by a craftsman cognizant of the necessary techniques. As previously noted, the replacement windows are not appropriate. The work is not consistent with Standard 6.

Visual Compatibility Criteria. *To maintain the special character of the Savannah Downtown 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.*

Relationship of materials, texture and color. *The relationship of materials, texture and color of the facade of a building or structure shall be visually compatible with the predominate materials, textures, and colors used on contributing buildings and structures to which the structure is visually related.*



As noted, the proposed window material is dissimilar to the original windows. The materials, profiles and the textures do not match.

A closer inspection reveals that there have been a number of changes to windows and balcony doors throughout the building. The most recently **approved** change occurred in 2024 under 24-002763-COA for Unit 77 on the 7th floor. The applicant had non-historic windows that were inoperable. They were approved to replace the windows with Andersen A-Series windows which have a wood interior and a fiberglass/Fibrex

exterior. This particular window was designed to focus on architectural authenticity. They have thicker rails and stiles making them more consistent with historic windows. It should be noted that these specific windows are located on the 7th floor and not readily visible to the general public. In prior years, there was only one COA issued in 2023 for window repair and no other approvals for window repair or replacement. None of the other window and some balcony door replacements have benefited from a COA and should be investigated by Code Enforcement. The proposed work is not consistent with this criterion.

Savannah Downtown Historic District Design Standards. The intent of these standards is to ensure appropriate new construction, additions, and alterations within the Savannah Downtown 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 resources.

The following design standards shall apply to new construction, additions, alterations to contributing and non-contributing buildings and structures, unless otherwise specified. Though certain building materials are prescribed herein, the Board 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.

For the purposes of evaluating the visual compatibility and design standards of exterior fenestration, where voids (windows, doors, and storefronts) in the exterior façade are substantially blocked by interior walls or built-in furniture, these may be considered part of the exterior wall if they are built within three feet of the exterior wall. For example, if an interior wall is built abutting the storefront, that interior wall is impacting the exterior design of the fenestration and may be subject to review by the Historic Board of Review.

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 provided limited pictures of the condition of the windows prior to replacement. It is also not clear that they were evaluated for repair by a craftsman cognizant of the necessary techniques. As previously noted, the replacement windows are not appropriate. The proposed work is not consistent with the historic district design standards.

STAFF RECOMMENDATION:

DENIAL for the after-the-fact window replacement and Special Exception request at 24 East Liberty Street, Unit 11. The proposed windows are incompatible with the historic windows visually, materially and in design; and the Special Exception criteria in §7.8.10.h.2.a.i are not met. For these reasons the applicant should replace with appropriate wood windows into the existing openings.

MW: CC: JB

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