

September 25, 2015

Mr. Bryan Green, Chair
Historic Architectural Review Commission
P.O. Box 1409
Key West, FL 33041



RE: 616 Eaton Street, Analysis of HARC Submittal of July 28, 2015 (H15-01-0842)

Dear Bryan,

I write to oppose the approval of HARC Application H15-01-0842, the demolition of rear additions and build back at 616 Eaton Street.

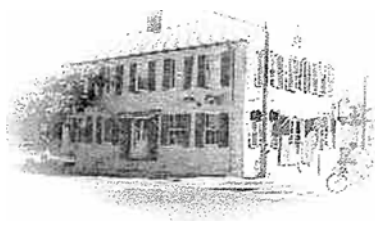
The purpose of this report is to analyze the July 28, 2015 HARC approval for the proposed development of 616 Eaton Street to determine if the approval was flawed or appropriate. The documents that were relied upon for this analysis included the applicant's submission for the July 28, 2015 meeting, the applicant's prior submission for the June 23, 2015 meeting, the HARC Guidelines, the Secretary of the Interior's Standards and Guidelines which are incorporated into the HARC Guidelines by reference, and which are also a requirement of the Florida Building Code – Existing Building, Chapter 11 and appendix B in the 2010 Edition (Chapter 12 and Appendix B in the 2014 Edition) and the public record of the subject meeting.

Based on my review of the above documents, it is my determination that the approval of the demolition and build back applications are both flawed and should be overturned on appeal. My findings and analysis follow.

The HARC Guidelines are based on the Secretary of the Interior's Standards and Guidelines. Compliance with both is required. The introduction on page 1 of the Guidelines states:

I INTRODUCTION

These "Design Guidelines in Key West's Historic District" are intended to preserve and protect the architectural environment and unique character of the historic neighborhoods of the Key West Historic District. Key West has one of the most significant of Florida's historic districts to be listed on the National Register of Historic Places by the National Park Service.



Any proposed rehabilitation or relocation of a designated historic structure shall follow the U.S. Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures (City of Key West Land Development Regulations, Chap III, article X: 3-10.3, p. X-13). All exterior work must have HARC approval whether or not a building permit is required. If a building permit is required, the applicant shall obtain HARC approval prior to the issuance of the permit.

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The guidelines are based upon the foundation of the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

These national standards were implemented to prevent the loss of our historical architectural heritage and are the basis for establishing design guidelines for historic districts. The Key West Land Development Regulations also contain many provisions pertaining to historic structures and districts.

In order to properly evaluate an application, HARC Commissioners must consider the totality of the Guidelines as they relate to a project. Page 15 of the Guidelines identifies 12 points that a HARC review is to cover. The proposal for 616 Eaton negatively impact the historic Districts on 4 of those 12 points, which are highlighted below.

A HARC review of proposed construction plans considers:

- What was the original design of the structure, and how much has survived?
- How will new construction affect exterior elements and appearance?
- **Will the project alter the massing and setback patterns of the building or streetscape?**
- Are the proposed changes reversible or permanent alterations?
- **Will the project cause damage to architectural integrity and design?**
- **Are the proposed changes appropriate to the site and its character?**
- Will the proposed materials and methods endanger the longevity of the structure?
- Is the building a contributing or noncontributing structure in the district?
- Will proposed landscaping, fencing and paving changes alter its historic character?
- Does the condition of the structure warrant proposed demolition of original fabric?
- **Will proposed outbuildings, additions, pools, or other structures detract from the site?**
- What was the evolution of the building over time and what elements should be retained?

The HARC Guidelines reproduce the U.S. Secretary of the Interior's Standards for Rehabilitation. Pages 16 and 17 are the Standards. The intent of the Standards are discussed on pages 18 through 23. The Florida Building Code – Existing Building, Appendix B, reproduces the Secretary of the Interior's Standards and Guidelines. The Guidelines are divided into "Recommended" and "Not Recommended" actions. The 616 Eaton Street Proposal fails to meet the Guidelines on 3 key points as follows:

NEW ADDITIONS TO HISTORIC BUILDINGS

An attached exterior addition to a historic building expands its "outer limits" to create a new profile. Because such expansion has the capability to radically change the historic appearance, an exterior addition should be considered only after it has been determined that the new use cannot be successfully met by altering noncharacter-defining interior spaces. If the new use cannot be met in this way, then an attached exterior addition is usually an acceptable alternative. New additions should be designed and constructed so that the character-defining features of the historic building are not radically changed, obscured, damaged, or destroyed in the process of rehabilitation. New design should always be clearly differentiated so that the addition does not appear to be part of the historic resources.

Recommended

Considering the attached exterior addition both in terms of the new use and the appearance of other buildings in* the historic district or neighborhood. Design for the new work may be contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship* of solids to voids and color.

Not Recommended

Designing a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.

Designing and constructing new additions that result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location, or setting.*

Using the same wall plane, roof line, cornice height, materials, siding lap, or window type to make additions appear to be a part of the historic Building.

Demolition is discussed on Page 39 of the Guidelines and specifically references Standard 9 as follows

DEMOLITIONS & RELOCATIONS

Demolition of historic structures, which alter the nature of an historic district or streetscape, should be avoided. Many structures that appear unattractive and unusable can often be returned to a useful life through planned renovations. Income-producing historic buildings are eligible for historic preservation tax credits (see standard 9).

1. A contributing historic structure should not be demolished unless its condition is irrevocably compromised by extreme deterioration.
2. Demolition permits cannot be granted until complete construction plans for the site are prepared and approved.
3. New construction on the site of the former location of a demolished structure shall conform to all setback and easement regulations required of any other new construction.

The referenced Standard from Page 17 states:

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The significant language here is: "...and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

The documents submitted for this project do not depict the entire 206 foot long building. Therefore, we combined the partial elevations into a single east elevation, attached to this report. The historic house, including the front porch, is about 30 feet deep. The complete addition is 176 feet more, which does not fit the intent, or the literal interpretation of "massing" or "scale & proportion" which are defined in the Guidelines as follows:

Massing: The structure should be compatible with the existing massing patterns of buildings in the historic zone.

Scale & Proportion: Projects should not exceed the established size and scale of other buildings in the vicinity. Proportion and scale refer to the relationship of height to width of the front elevation. When most of the buildings along a streetscape have similar proportions, it would be harmful to construct a new building of substantially different proportion.

Clearly, the proposed addition does not meet the requirements of the HARC Guidelines as required under "Demolitions & Relocations" or other HARC requirement that follow.

Additions and alterations are discussed on pages 36 and 37 of the HARC Guidelines as follows:

ADDITIONS & ALTERATIONS/ NEW CONSTRUCTION

Alterations, additions, and new construction can permanently damage the design of historic buildings and streetscapes by introducing out of scale, poorly designed changes, which alter the symmetry and beauty of historic districts. Poorly constructed additions may lead to the deterioration of a building by altering the functional design of a historic structure redirecting water in areas, which produce wood rot and decay. Modern additions commonly deteriorate before historic original portions of structure and if deemed necessary, should be carefully planned and constructed to minimize impact on the structure's health and appearance.

HARC reviews alterations to non-contributing structures to ensure that the proposed alterations will not create a structure that is an intrusion in the historic district. Whenever possible, HARC will encourage projects that lessen the detracting of an addition, alteration or new structure upon the integrity of the historic district, whether the construction is new or proposed by contributing or noncontributing buildings within the district.

1. A structure shall not be altered and/or expanded in such a manner that its essential character-defining features are disguised or concealed.

2. Additions and alteration **may be reviewed more liberally on non-contributing** buildings, which lack architectural distinction.
3. Addition design should be **compatible with the characteristics of the original structure, neighboring buildings and streetscapes.***
4. **Additions should be constructed with a scale, height and mass that is appropriate to the original building and its neighbors.**
5. Additions should be attached to *less publicly visible secondary elevations* of an historic structure.
6. Additions should not *alter the balance and symmetry* of an historic structure.
7. **No existing structure shall be enlarged so that its proportions are out of scale with its surroundings.**
8. New additions should be designed and constructed to be clearly differentiated from the historical so that character-defining features are not changed, obscured, damaged or destroyed.

In order to preserve the integrity of the Historic District, a number of design criteria have been developed by which individual structures may be compared and evaluated. The intent in developing these criteria has been to identify specific design elements which, if repeated or echoed a sufficient number of times, will assure the maintenance and preservation of the architectural character of the district.

These criteria will become the working tools for the developer, architect and builder. Ideally, they should be studied and evaluated before design development work begins so that the desired relationships can be established as design objectives, properly relating individual buildings to the total environment.

These Design Guidelines are not intended to exclude good contemporary design, as new complementary design is encouraged. Traditional design elements are also encouraged, yet the distinction between historic and contemporary should be evident.

The criteria that guides new construction in historic zones insures that new construction shall not interfere with the essential form and integrity of the historic properties and their environment.

This is the heart of the issue. The proposed structure is a flagrant violation of the purpose of the HARC Guidelines: to protect the form and integrity of the historic district... **"...TO ENSURE THAT THE PROPOSED ALTERATIONS WILL NOT CREATE A STRUCTURE WHICH IS AN INTURSION IN THE HISTORIC DISTRICT."**

The proposal for 616 Eaton Street fails to meet the HARC Guidelines in the following ways, from page 38a of the HARC Guidelines.

4. **Proportion, Scale and Mass - massing, scale and proportion shall be similar to that of existing historical buildings in the historical zone. No new construction shall be enlarged so that its proportions are out of scale with its surroundings.** No new construction shall be more than two and a half stories. No structure shall outsize the majority of structures in the streetscape or historic zone.

The proposal fails to meet this guideline. Note that the requirement is "...shall be similar to that of **EXISTING HISTORICAL BUILDINGS IN THE HISTORICAL ZONE.** No new construction shall be enlarged so that its proportions are out of scale with its surrounding. **No structure shall outsize the structures in the ...historic zone.**"

The 616 Eaton Street structure is 206 feet long. By way of comparison, the Gato Building at 1100 Simonton Street that houses the Monroe County administrative offices and the State Department of Health Offices, is 133'-8" long; the Custom House is 117'-3" long; and 426 Elizabeth Street, one of the largest residences in this historic zone is less than 50 feet long. In fact, this building is so large that none of the elevations or renderings for this project show its full length. Clearly, this project's "scale and proportion" are "out of scale" with its surroundings.

5. **Compatibility** - Design **must** be compatible with Key West architectural characteristics in the historical zones. **All new construction must be in keeping with the historic character in terms of size, scale, design, materials, color and texture.**

The proposal fails to meet this guideline. The design uses multiple forms, materials, color and texture that are not in keeping with the district. Historic Buildings throughout the District have a repetitive pattern of solids to voids which establish a rhythm. By way of example, 3 foot wide windows spaced 7.5 on center create a pattern and rhythm of 1 to 1.5 to 1 to 1.5 to 1., etc. with the window serving as the void in the pattern. (The Gato Building is an example of this concept.) The 616 Eaton proposal ignores the historic characteristics of the District through the use of large expanses of glass, glass railings, roof forms that have little relationship to the surrounding structures and elements that compete for attention: the golf cart roof, the bay window at the south easterly corner of the family room set under a quarter circle balcony with round columns topped by multiple sloped roofs, which is opposite a triangular balcony above the sauna. These elements compete for attention with each other. But more importantly, they are not compatible with the "size, scale, design, materials, color and texture" of the architectural characteristics in the historical zone.

6. **Building Detail** – All new buildings shall incorporate a level of detail that assures compatibility with the surrounding historic context. New construction shall not precisely mimic the details of historic buildings **but should have features that are compatible with the lines of historic architecture.**

The above description is applicable here as well: the design does not have "features that are compatible with the lines of historic architecture". The use of eyebrows over windows and doors is one example of non-compatible detailing.

7. **Relationship of materials** – Materials used on new construction **shall be of similar color, dimension, texture, and appearance as historic fabrics.** The predominant exterior finish in historic zones is wood weatherboard, clapboard, drop siding, or board and batten. Exceptions for the use of composite materials may be permissible. Roofing is primarily sheet metal or metal shingles. **New construction shall establish a relationship with existing historic structures by utilizing similar finishes and metals.**

The project fails to meet this criteria. The extensive use of green glass for guardrails, and silver aluminum for windows and doors are examples of this. (Window and door frames on historic homes are typically painted wood, with white being a common color.)

On page 52 of the Guidelines, Historic Architecture Design Principles are discussed. The applicable points are highlighted where the project fails to meet the Guidelines.

VII. HISTORIC ARCHITECTURE DESIGN PRINCIPLES

The following basic principles of compatible architectural design are also considered by HARC when determining if a project is appropriate for a specific building, street or historic preservation zone:

Siting: Structures should be placed so that their siting is compatible with the zone's historical period as well as city codes.

Massing: The structure should be compatible with the existing massing patterns of buildings in its historic zone.

Scale & Proportion: Projects should not exceed the established size and scale of other buildings in the vicinity. Proportion and scale refer to the relationship of height to width of the front elevation. When most of the buildings along a streetscape have similar proportions, it would be harmful to construct a new building of substantially different proportion.

Material: Materials used should be identical or similar in appearance to original fabric.

Texture: Key West's historic buildings use a variety of materials including wood, brick, stone, concrete, steel and stucco. New buildings, which use materials of a similar texture, are more compatible in historic zones.

Roof form: Most roofing in the historic residential zones consists of sloped gables or hipped roofs. Many commercial structures have flat roofing. New structures will be more compatible if the common roof forms of nearby properties are used in their design.

Rhythm: The concept of rhythm is the regular recurrence of related elements. In a building this is generally the recurrent alternating pattern of solids and voids (such as the relationship of wall space to windows and doors) experienced while passing by or through a building. By using a similar rhythmic pattern in a new building a more sympathetic relationship can be obtained.

Detailing: Design elements such as trim or railings, which are important to the historic appearance of a structure, should be retained or duplicated if deterioration makes retention impossible.

Color: Color is an important factor in Key West architecture. Key West houses were usually painted in subtle colors, predominantly white, gray, and lightly hued pastels with contrasting trim and shutters. Color is an intrinsic quality of a building material such as brick or stone, as well as an applied coating such as paint. Historic research is often used to determine original paint colors for renovations.

As discussed above, the project does not meet these basic principles. HARC failed in its obligation to protect the district "when determining if a project is appropriate for a ...historic preservation zone."

Massing: This structure is not compatible with the existing massing patterns. The attempt to break down the massing fails in that this is one single structure over 206 feet long. The masses are not compatible with each other, let alone the surrounding district.

Scale/Proportion: **“projects should not exceed the established size and scale of other buildings in the historic zone.”** This building is four times the size of the largest single family residence in this historic zone. In fact, it is 2.5 times longer than the largest commercial structure, the adjacent church.

Roof form. The roof forms do not reflect the neighboring structures in that they use odd and non-typical angles and slopes. This is most obvious in the golf cart carport roof and the butterfly roof over the entertainment wing.

Rhythm: The concept of rhythm – the regular recurrence of related elements – is non-existent. In fact, this design appears to intentionally avoid this concept through the use of unrelated elements.

Color: I have not seen a color palette, but the notations of “silver aluminum and green glass” do not invoke images of the Key West Historic District.

And finally, on page 53:

V. New Construction

(Appropriate standard 8, 9 & 10 may apply). New construction should be compatible with existing buildings and streetscapes. Building height and volume, scale, site orientation, façade proportions, window patterns, architectural details, roof form, landscaping, and fencing are elements that must be compatible with existing historic construction located near the site. *Examples:* new freestanding structures, carports, decks and pools.

This analysis is based only upon my review of the public record of the meeting, the documents submitted by the applicant, the HARC Guidelines and the Secretary of the Interior’s Standards and Guidelines that are included in the Florida Building Code. Based on those documents, which are a part of the public record for this application, the HARC ruling to approve is not appropriate. The HARC failed in its obligation to protect the surrounding historic neighborhood.

In support of this analysis, we have prepared a complete east side elevation, which is a composite of elevations included in the application. We prepared this elevation because it was not included in the application. This allows for a fair analysis of the building scale. We are preparing a computer modeled rendering that will be submitted prior to the September 29th meeting.

The Certificate of Appropriateness should be overturned and the application should be denied.

Please call if you have any questions or need further assistance.

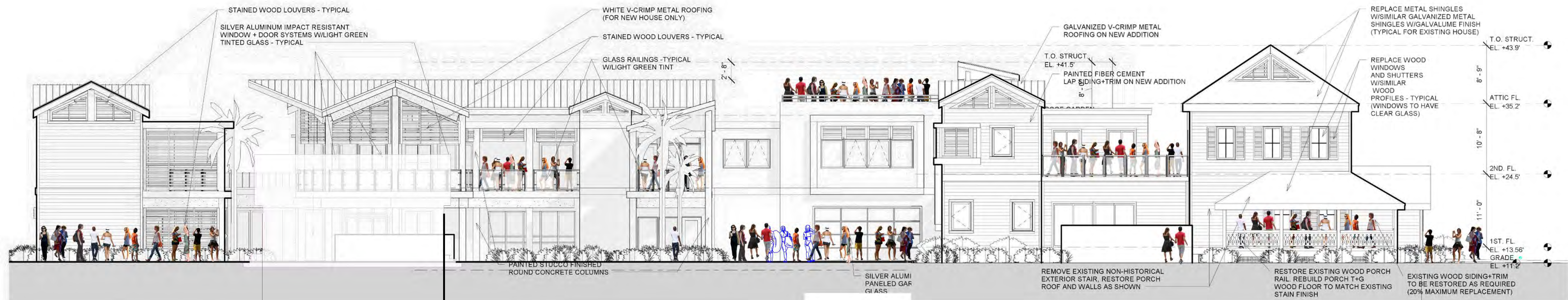
Sincerely,



Bert L. Bender, Architect

BLB/ddk

Cc: Enid Torregrosa, Kelly Perkins, All HARC Commissioners, Dana Day, Wayne LaRue Smith, Brett Smith, Ron Ramsingh, Bill Horn



416 Elizabeth Street
27'-0"

616 Eaton Street 206'-0"

E.H. Gato Cigar Factory 133'-8"

Custom House 117'-3"

426 Elizabeth Street 49'-3"



E.H. Gato Cigar Factory



426 Elizabeth Street

616 Eaton Street Composite Elevation
from HARC submittal 7-10-15
All Buildings are shown at the same scale

