



## MEMORANDUM

To: Brian Barroso, City Manager

From: Katie P. Halloran  
Planning Director

Meeting Date: February 4, 2025

Agenda Item: **File 25-3211 - Text amendment to the Historic Architectural Review Commission's Guidelines** - An Ordinance of the City of Key West, Florida, to amend the Historic Architectural Review Commission Guidelines for Roofing, specifically Section VI (C.) Roofing, as referenced in Chapter 90 (Administration), Article II, Division 4 - Historic Architectural Review Commission of the City of Key West Land Development Regulations; Providing for severability; Providing for repeal of inconsistent provisions; Providing for an effective date.

Request: Approval of proposed amendments to the Historic Architectural Review Commission guidelines for roofing as referenced in Section 90-142 of the City of Key West Land Development Regulations.

Applicant: City of Key West

### BACKGROUND:

On August 27, 2024, the Historic Architectural Review Commission (HARC) reviewed two large-scale projects involving standing seam roofing, ultimately approving both. Recognizing the potential for future applications, the Commission recommended updating the Historic Architectural Guidelines to include standing seam as an approved roofing material under certain specific projects. During the September 24, 2024, meeting, HARC further refined the proposed guideline to be considered only for non-historic commercial or governmental buildings. Furthermore, on October 22, 2024, the Historic Architectural Review Commission approved the proposed amendments to the Historic Architectural Guidelines.

The city's Historic District, listed on the National Register of Historic Places, incorporates a significant portion of the island and includes over 3,000 historic buildings. The Historic Architectural Guidelines are the basis for reviewing every project. These changes to the guidelines reflect the Commission's commitment to preserving the historic integrity of Key West's built heritage while balancing new construction requirements.

### Previous City Actions:

Planning Board Approval: January 16, 2025

HARC Recommendation of Approval: October 22, 2024

HARC Discussion Item: September 24, 2024

## **ANALYSIS:**

The proposed amendments, drafted as ordinance, are attached as part of this report. The amendments under review were approved by the Historic Architectural Review Commission on October 22, 2024, and then presented to the Planning Board on January 16, 2025, to include standing seam as an approved material for specific non-historic commercial or governmental buildings through Resolution 2025-004. Historic Architectural Guidelines are adopted by ordinance under Section 90-142 of the Land Development Regulations and any changes require compliance with Section 90-520 of the Code. In determining whether to grant a requested amendment, the City Commission shall consider the consistency of the proposed amendments with the intent of the Comprehensive Plan. The Code provides criteria for which LDR amendments must be evaluated:

***Section 90-520 (6) Justification. The need and justification for the proposed change shall be stated. The evaluation shall address but shall not be limited to the following issues:***

- a. Comprehensive Plan consistency. Identifying impacts of the proposed change in zoning on the Comprehensive Plan. The zoning must be consistent with the Co25-3211 Comprehensive Plan.***

The amendments to roofing under the Historic Architectural Guidelines have been proposed and recommended for approval by the Historic Architectural Review Commission. The Historic Preservation Element under Future Land Use in the City of Key West Comprehensive Plan states the importance of maintaining the unique architectural heritage of buildings and structures and the implementation of HARC Guidelines and federal Standards when reviewing new development.

Although the City's 2021-2024 Strategic Plan is silent pertaining to roofing, it is in the best interest for our citizens to have fair and easy to understand regulations. The Historic Architectural Review Commission is chartered to preserve the character and appearance of the Key West Historic District through review and regulation of proposed changes in the district. The proposed amendments for new guidelines for roofing will assist HARC and their staff in their responsibilities.

The proposed text amendment for roofing will have no impact in zoning on the Comprehensive Plan.

- b. Impact on surrounding properties and infrastructure. The effect of the change, if any, on the particular property and all surrounding properties. Identify potential land use incompatibility and impacts on infrastructure.***

There will be no impact on surrounding property or infrastructure on a particular property.

- c. Avoidance of special treatment. The proposed change shall not constitute a spot zone change. Spot zoning occurs when:***

- 1. A small parcel of land is singled out for special and privileged treatment:***

The proposed amendments to the LDRs will not affect the zoning of any specific parcel in the City.

**2. *The singling out is not in the public interest but only for the benefit of the landowner.***

The proposed text amendment does not affect the City's official zoning map nor the City's future land use map.

**3. *The action is not consistent with the adopted comprehensive plan.***

The proposed amendment is consistent with the adopted comprehensive plan and will ensure consistency between the LDRs and the comprehensive plan.

**d. *Undeveloped land with similar comprehensive plan future land use map designation. The amount of undeveloped land in the general area and in the city having the same zoning classification as that requested shall be stated.***

This proposed amendment is not associated with a particular comprehensive plan future land use designation or specific zoning district.

**PROCESS:**

Section 90-523 of the Land Development Regulations states that the City Commission shall review and act upon all proposed amendments to the LDRs and the official zoning map. If the Planning Board approves the text amendment the City Commission shall schedule a public hearing on the petition. The City Commission review process requires two readings of the proposed amendments. Absent of any appeals, the ordinance will be rendered to the Florida Department of Commerce, who will have 60 days to issue an order of consistency. The final ordinance will be sent to the Florida Department of State, Division of Historical Resources, as required by the city's Certified Local Government Agreement of 1991.

**OPTIONS/ ADVANTAGES/ DISADVANTAGES:**

**Option 1: Approve** the text amendment to the Historic Architectural Guidelines for Roofing as per the recommendations from the Historic Architectural Review Commission and the Planning Board through Resolution 2025-004.

- a. **Consistency with the City's Comprehensive and Strategic Plans:** This action would provide new guidelines that will allow the use of standing seam on specific non-historic or governmental buildings.
- b. **Financial Impact:**  
There will be no cost to the City if this request is approved.

**Option 2: Deny** the proposed text amendment to the Historic Architectural Guidelines for Roofing.

- a. **Consistency with the City's Comprehensive and Strategic Plan:** This action would not be consistent with both the City's Comprehensive and Strategic Plan, as the current roofing guidelines lacks in comprehensive criteria for standing seam metal roofs. The current guidelines do not include standing seam as a new roofing material.
- b. **Financial Impact:**  
There will be no cost to the City if this request is denied.

**RECOMMENDATION:**

The Historic Architectural Review Commission, the Planning Board, and the Planning Department recommend consideration and approval of Option 1.