

THE CITY OF KEY WEST
PLANNING BOARD
Staff Report



To: Chairman Peter Batty Jr. and Planning Board Members

Through: Katie P. Halloran, Planning Director

From: Daniela Salume, MFA
Historic Architectural Preservationist

Meeting Date: January 16, 2025

Agenda Item: **Text amendments to the Historic Architectural Guidelines** - A Resolution of the City of Key West Planning Board recommending an Ordinance to the City Commission to amend the Historic Architectural Review Commission Design Guidelines for Roofing, as referenced in section 90-142 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 text amendments to the Historic Architectural Review Commission Design Guidelines for Roofing.

Applicant: Historic Architectural Review Commission, 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 commercial and 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. Permits will be carefully reviewed to ensure they do not compromise the visual character of historic neighborhoods while allowing the use of non-traditional construction materials. These changes reflect the Commission's commitment to preserving the historic integrity of Key West's built heritage.

Requested/ Proposed Amendment:

The Historic Architectural Review Commission respectfully recommends to the Planning Board and City Commission the following text amendment to the Historic Architectural Guidelines, specifically Roofing.

Roofing

Many historic structures in Key West have metal shingle roofing. Other common roofing materials include metal V-crimp, and conventional asphalt shingles. Roof replacements should be done on an in-kind basis, with the new roof matching the materials used previously, unless HARC believes the replacement material to be more suitable than the existing roofing material. Roof form and secondary features such as dormers, chimneys, and other details are important in defining the architectural style of the building.

1. Historical roofing materials such as metal shingles should be preserved when possible. If replacement is necessary, similar metal shingles must be used, not inappropriate roofing materials such as V-crimp metal. If a roof can be shown to have been made of another material such as wood shingles or slate, it may be replaced with that material. V-crimp roofs may be replaced with metal shingles.
2. Conventional modern roofing materials such as asphalt shingles, V-crimp, or composition roofing may be used on non-contributing structures, provided that they do not detract from the characteristics of nearby historic properties.
3. Roofing materials and forms used in new construction must be visually compatible with the existing historical and architectural context of the streetscape and neighborhood.
4. The form and configuration of a roof must not be altered in pitch, design, materials or shape unless the resulting changes would return the roof to a verifiable and appropriate historical form. Original features such as scuttles, chimneys and roof porches should not be removed or altered.
5. The public view of the roofline should not be altered by the addition of new features such as dormers, scuttles, vents or skylights. Such features may be allowed on roof surfaces not visible from a public right-of-way.
6. Fascia, soffit, cornice and bracket elements shall not be altered or removed unless it can be documented by photographic or other verifiable historical evidence that they were not historically accurate in form and placement.

*Coding: Added language is **underlined**; deleted language is ~~**struck through**~~ at first reading.

7. The use of standing seam as a replacement or as a new roof material for non-historic commercial or governmental buildings may be considered by the commission. This consideration will be based on the exposure of the roof to its urban context as the new roof cannot take precedence over historic surrounding buildings. Additionally, the seams must have a low profile with finished side edges and gutters. Low profile seams, which are typically 1 inch or less in height, are designed to be less pronounced compared to traditional standing seam profiles. This design approach offers a more subtle, less obtrusive appearance while effectively managing water drainage, making it an appropriate choice for buildings within historic contexts where minimal visual impact is preferred. Finish color shall be silver mill or white.

The proposed roof replacement will be assessed in terms of its mass and scale, to ensure compatibility with the surrounding historic fabric. The evaluation will focus on preserving the architectural character of the historic district, as outlined in the city's historic preservation standards. In cases where a standing seam metal roof has been installed without a permit, approval from the HARC Commission is required if seeking to replace in-kind.

Historic Architectural Guidelines and Land Development Regulations Text Amendment Process:

HARC Approval	October 22, 2024
Planning Board Meeting:	December 19, 2024
City Commission (1 st Reading/ Transmittal):	January 7, 2024
Local Appeal Period:	30 days
DOC Review (1 st Reading):	Up to 60 days
City Commission (2 nd Reading/Adoption):	February 4, 2024
Local Appeal Period	Up to 30 days
DOC Review (2 nd Reading):	Up to 45 days
DOC Notice of Intent (NOI):	Effective when NOI posted to DOC site
State Historic Preservation Office	Up to 45 days

Analysis:

The proposed amendments, drafted as ordinance, are attached as part of this report. The amendments under review were presented and approved as an action item to the Historic Architectural Review Commission on October 22, 2024.

The Historic Architectural Guidelines are adopted by ordinance under Sec. 90-142. Amendments to the guidelines must follow the same procedural requirements as amendments to the Land Development Regulations. The purpose of Chapter 90, Article VI, Division 2 of the Land Development Regulations (the "LDRs") of the Code of Ordinances (the "Code") of the City of Key West, Florida (the "City") is to provide a means for changing the text of the Land Development Regulations. It is not intended to relieve hardships nor to confer special privileges or rights to any person, but only to make necessary adjustments considering changed conditions. In determining whether to grant a requested amendment, the Planning

Board and the City Commission shall consider the consistency of the proposed amendment with the intent of the Comprehensive Plan.

Pursuant to Code Section 90-552, the Planning Board shall hold a public hearing thereon with due public notice. The Planning Board shall consider recommendations of the City Planner, City Attorney, Building Official and other information submitted at the scheduled public hearing. The Planning Board shall transmit a written report and recommendation concerning the proposed change in the LDRs to the City Commission for official action.

The Code provides criteria by 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 Comprehensive Plan.

The amendments to the Historic Architectural Guidelines for roofing have been proposed 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.

The proposed text amendment for roofing will have no impact in zoning on the Comprehensive Plan. Moreover, policy 1A-1.2.1; HARC Guidelines, under the Historic Preservation Element of the Comprehensive Plan establishes that the City and HARC shall continue to protect all historically significant structures and historic districts by periodically updating the HARC Guidelines.

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 will assist HARC and their staff in their responsibilities.

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 or a particular property. To the contrary, the proposed text amendments promote the preservation of the character of the historic district.

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. The text amendment will protect the historic character of the district.

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.

RECOMMENDATION:

The Planning Department and the Historic Architectural Review Commission, based on the criteria established by the Comprehensive Plan and the Land Development Regulations, respectfully recommends to the Planning Board that the request to amend the Historic Architectural Guidelines, specifically, guidelines for Roofing be **APPROVED**.