

# Steven Avdakov, R.A.

## South Florida Preservation Expertise



**Historic Hampton House**  
Miami, Florida  
Preservation Consultant, Adaptive Reuse



**Greynolds Park**  
Miami, Florida  
Historic Preservation Consultant



**Villa Providence**  
Hallandale Beach, Florida  
Preservation Architect



**Harbour Bay Condominium**  
Bay Harbor Islands, Florida  
Local Designation and Appeal



**Mai-Kai Restaurant**  
Oakland Park, Florida  
National Register Nomination

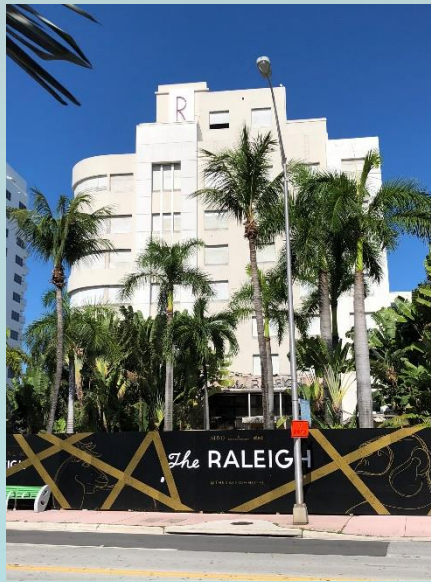


**Parrot Jungle Historic District**  
Pinecrest, Florida  
National Register Nomination

# Certificate of Appropriateness Criteria

## Applicability

- The project involves the Raleigh Hotel, 1775 Collins Avenue, the Richmond Hotel, 1757 Collins Avenue, and the South Seas Hotel, 1751 Collins Avenue., all in Miami Beach, Florida.
- All three buildings are contributing buildings in the Ocean Drive-Collins Avenue Historic District, which was established in 1987 per Sec. 118-593.(2)b) of the Miami Beach Code.
- As such, all work is subject to review and must be authorized by a Certificate of Appropriateness (COA).



# Certificate of Appropriateness Criteria

## Purpose of the District (Miami Beach Code Sec. 118-502)

- The protection of such historic sites and districts to combat urban blight, promote tourism, foster civic pride, and ***maintain physical evidence of the city's heritage***;
- The promotion of excellence in urban design by ***assuring the compatibility*** of restored, rehabilitated or replaced structures within designated historic districts;



# Certificate of Appropriateness Criteria

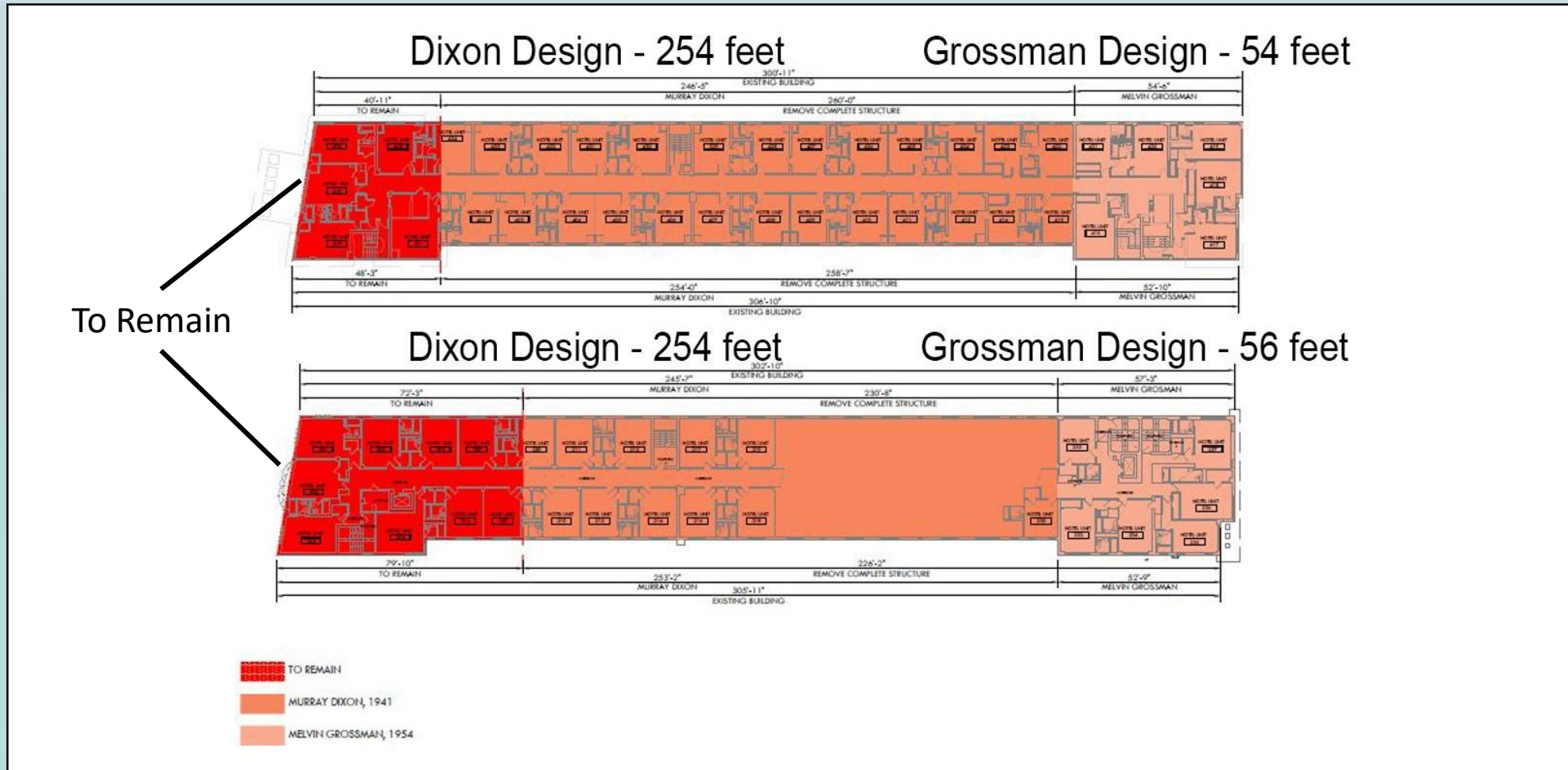
## Decision Process (Miami Beach Code Sec. 118-564)

A decision on an application for a certificate of appropriateness shall be based upon the following:

- (1) Evaluation of the compatibility of the physical alteration or improvement with surrounding properties and where applicable compliance with the following:
  - a. **The Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings** as revised from time to time; and
  - b. Other guidelines/policies/plans adopted or approved by resolution or ordinance by the city commission.

# Demolition of Significant Historic Fabric

Approximately 84% of buildings to be demolished



# Secretary of the Interior's Standards

## Standard 2

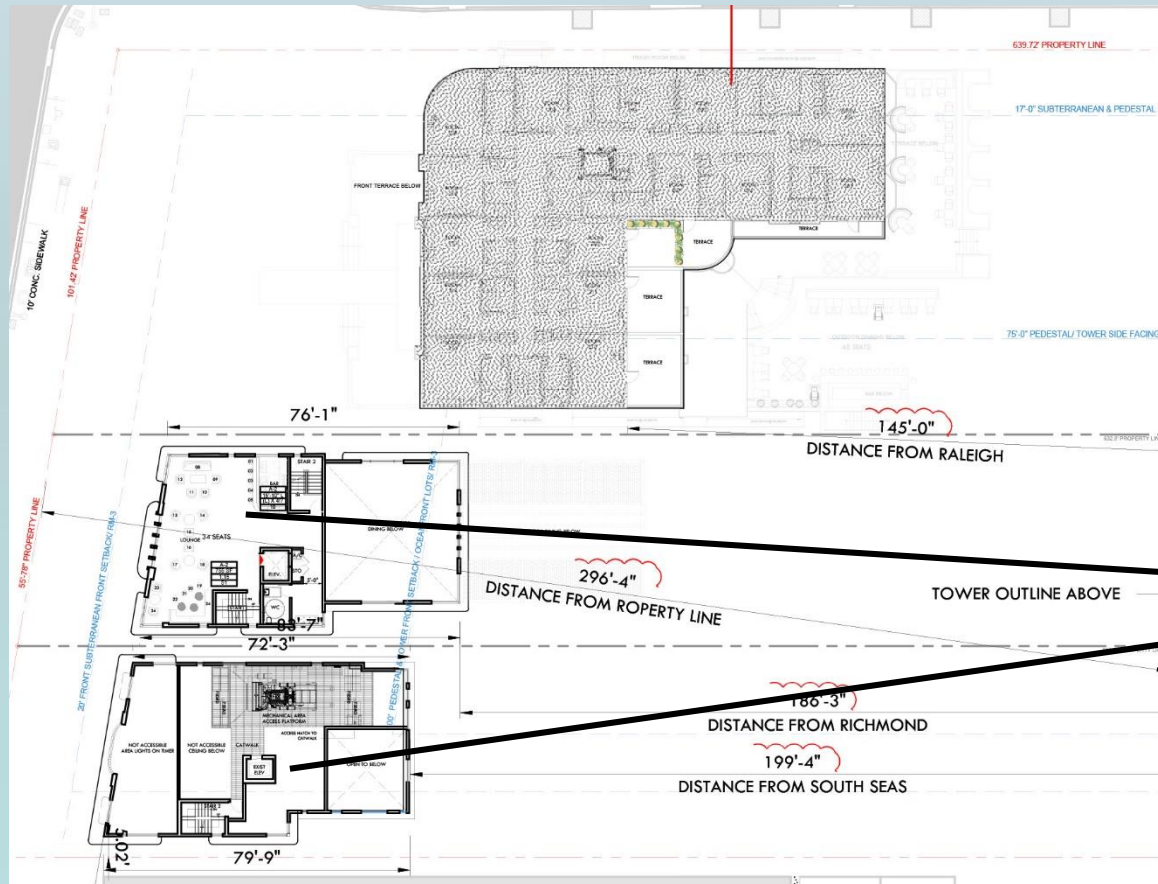
The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

- Extent of the demolition will destroy the historic architectural fabric and historic urban relationship of two contributing resources
- Grossman renovations are contributing and are within the era of significance
- Demolition of 84% of these two contributing buildings will create an adverse effect

**NOT IN COMPLIANCE**

# Destruction of Physical Record of Properties

The Richmond and South Seas never existed in this form - creates a false sense of history



Remnants of Richmond and South Seas

# Secretary of the Interior's Standards

## Standard 3

Each property will 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 elements from other historic properties, will not be undertaken.

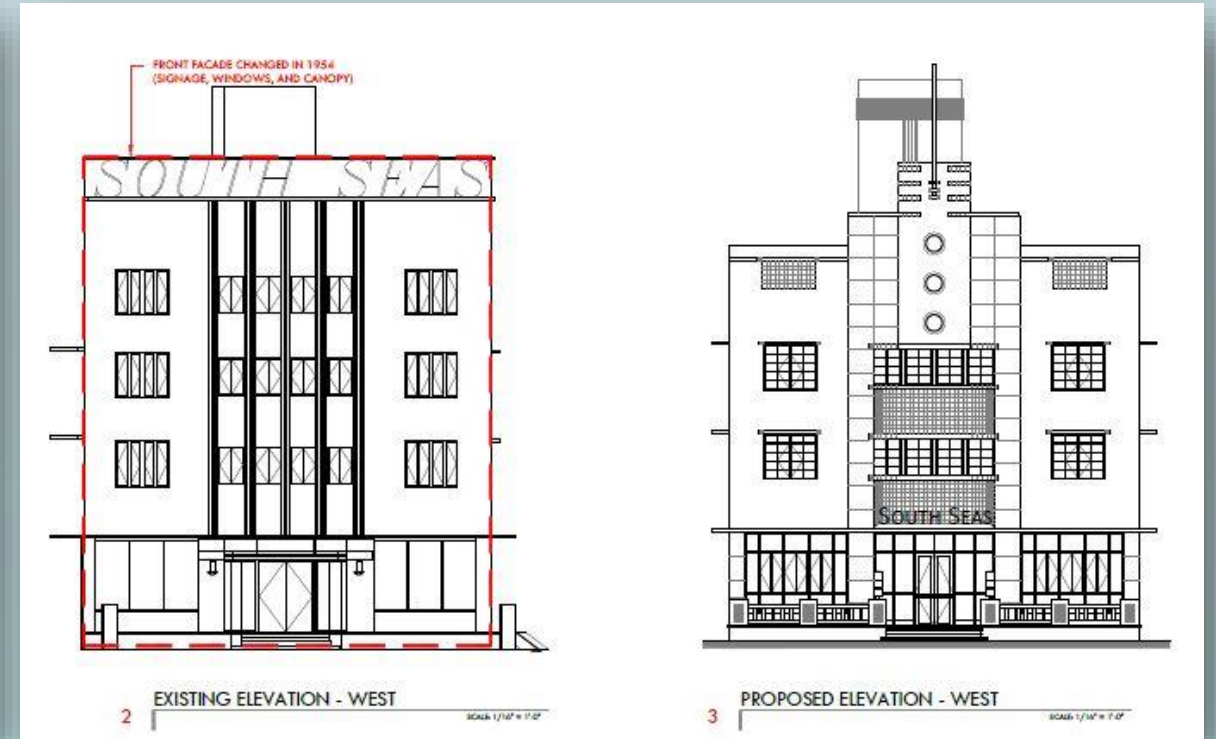
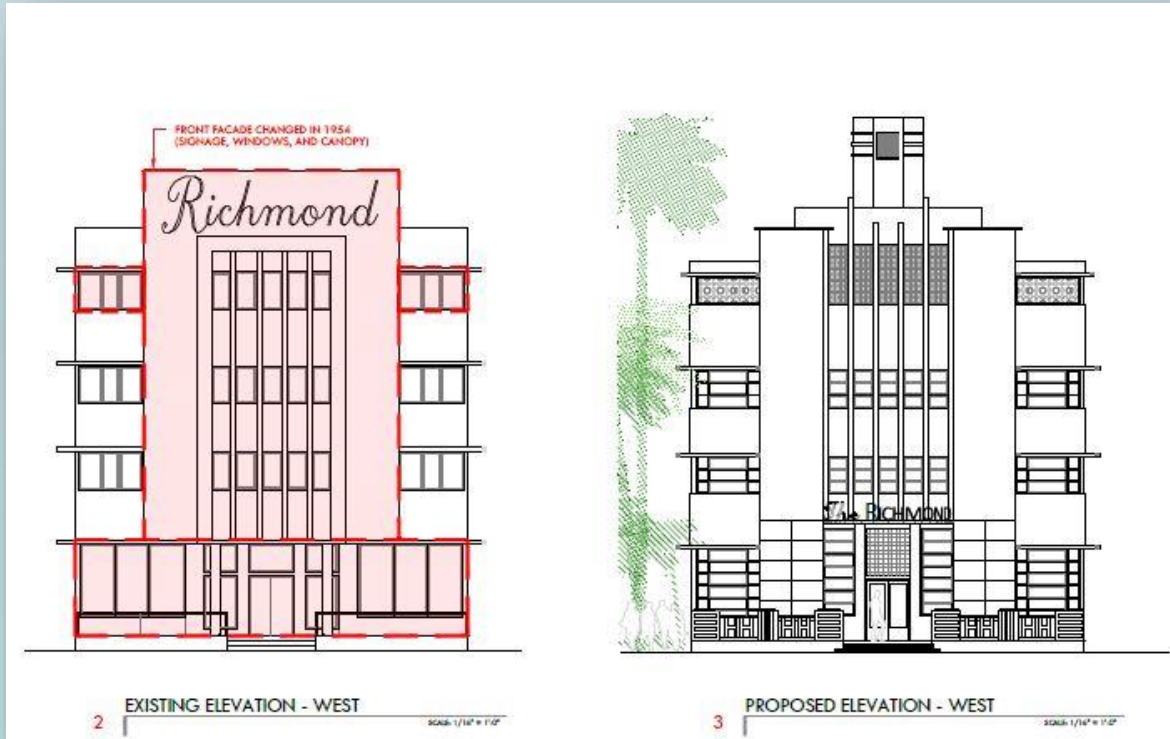
- Demolition will generate two building footprints that never existed, creating a false sense of history
- Result will be neither a Dixon building nor a Grossman
- Stripping back facades to 1941 will create a false sense of history
- Removal of historic layers will create an adverse effect

**NOT IN COMPLIANCE**



# Demolition of Historic Layering

Miami Modern facades (Grossman - 1954) to be removed and replaced by recreated Art Deco (Dixon - 1941) facades



# Secretary of the Interior's Standards

## Standard 4

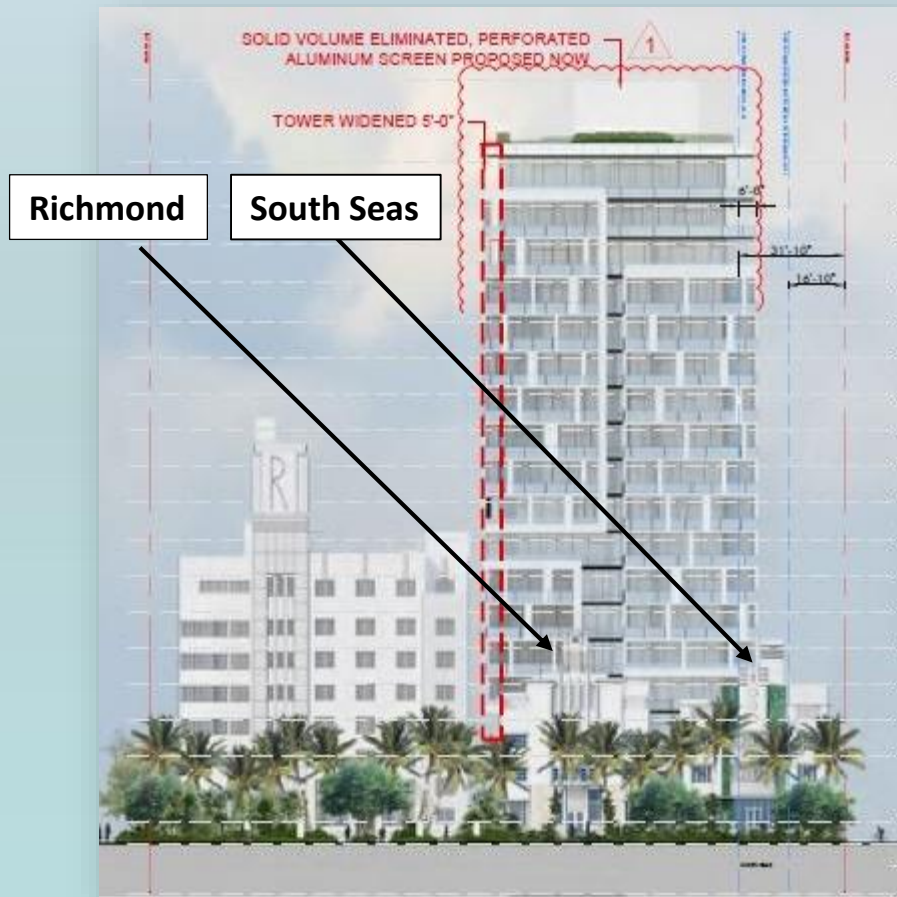
Changes to a property that have acquired historic significance in their own right will be retained and preserved.

- Grossman renovations are contributing and are within the era of significance
- Existing facades have been extant for 66 of the 80 years of building existence
- Facades were present when the District was listed, both at the national level (1979) and at the local level (1986)
- Miami Modern (MIMO) architecture is an important component of the District
- Approximately 17% of the buildings in the District are classified as MIMO, including the Richmond and South Seas
- Removal of historic layers will create an adverse effect

**NOT IN COMPLIANCE**

# Proposed Scale of New Construction

200 foot tower to be constructed behind Richmond and South Seas



Winter Solstice Projected Site Plan

# Secretary of the Interior's Standards

## Standard 9

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

- Proposed massive tower is out of scale with its surroundings
- The revised tower would still dwarf the Richmond and the South Seas buildings
- Any addition should be compatible in size and scale with the other buildings in the immediate area
- Tower would create shade that would adversely impact adjacent contributing buildings that were designed to be seen and function in light

**NOT IN COMPLIANCE**

# Demolition is Irreversible



Roney Plaza  
Demolished 1968



Atlantis  
Demolished 1973



# Secretary of the Interior's Standards

## Standard 10

New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

- Demolition is not reversible!
- Essential form and integrity of property will be impaired
- Even if new construction removed, remaining buildings and site will no longer be an accurate physical record of time, place and use

**NOT IN COMPLIANCE**

# Alternative Approach for Funding Preservation

## **“Getting the preservation right”**

- In accordance with the Secretary of the Interior’s Standards
- Financial incentives allow for the reduction of the height of the proposed tower

## **The Federal Historic Rehabilitation Tax Credit**

The Raleigh Hotel, The Richmond Hotel, and The South Seas Hotel are:

- contributing resources in National Register-listed Miami Beach Architectural Historic District
- income producing properties
- eligible to receive the 20% Federal Historic Rehabilitation Tax Credit

# The Federal Historic Rehabilitation Tax Credit

- Credit of 20% of the amount spent in the rehabilitation of a certified historic building
- Dollar-for-dollar reduction of income tax owed
- Credits can be syndicated to raise capital for the project
- Building must be income-producing
- Property must be listed in National Register of Historic Places
- Work must comply with Secretary of Interior's Standards
- New construction allowed, but not available for credits
- Reviewed by the Florida State Historic Preservation Office and National Park Service



# Fontainebleau Resort, Miami Beach



- Crescent building - Morris Lapidus (1954), north tower - A. Herbert Mathes (1959)
- Rehabilitation work and construction of new tower
- Completed 2008, certified 2009
- Total cost \$1 billion
- Qualified Rehabilitation Expenses (QRE) available for 20% tax credit: \$317 million
- Largest project in Florida to use Historic Tax Credits

# Loews, Miami Beach



- Rehabilitation of San Moritz (Roy France - 1939)
- Construction of 18-story tower
- Completed 1998, certified 1999
- QRE available for 20% tax credit: \$9 million

# TWA Hotel, JFK Airport

- Conversion of TWA Terminal (Eero Saarinen - 1962) into hotel lobby
- Construction of two new curved wings
- Completed 2019
- Total cost \$265 million
- QRE available for 20% tax credit: \$180 million est.



# Ace Hotel, New Orleans

- Restoration of the 1920s building, construction of a 4-story addition to create a boutique hotel
- Completed 2017
- Total cost \$76 million
- QRE available for 20% tax credit: \$35.6 million



# Tax Credit Projects in Vicinity of The Raleigh



Sagamore (2004)  
\$16,025,000 QRE



National (2003)  
\$11,000,000 QRE



Ritz Plaza (2012)  
\$41,606,332 QRE



Seacomber (2000)  
\$4,258,000 QRE



Surfcomber (2000)  
\$6,025,000 QRE



Shore Club (2005)  
\$39,070,584 QRE

# Other Tax Credit Hotel Projects in Miami Beach

<b>Name</b>	<b>Date Certified</b>	<b>QRE available for 20% credit</b>
Monticello Hotel	2018	\$3,390,000
El Paseo Hotel	2017	\$5,200,000
Harding Apartments (Waterside Hotel)	2017	\$3,100,000
Embassy Hotel	2016	\$11,315,000
Pompeii Apartments (Seaside All Suites)	2016	\$2,500,000
Lincoln Arms Suites	2016	\$2,500,000
Croydon Arms (Hotel Croydon)	2015	\$10,000,000
Edison Hotel	2014	\$6,500,000
Breakwater Hotel	2014	\$9,000,000
Collins Plaza Hotel	2013	\$3,500,000
Hotel Clifton	2012	\$2,397,870
Sinclair Hotel (Segovia & Barcelona)	2009	\$3,500,000
Riviera Suites	2009	\$4,465,000

# Other Tax Credit Hotel Projects in Miami Beach

<b>Name</b>	<b>Date Certified</b>	<b>QRE available for 20% credit</b>
Anglers Hotel	2008	\$8,800,000
Victor Hotel	2005	\$7,783,287
Brooklyn Hotel	2005	\$1,400,000
Brown's Hotel	2005	\$3,000,000
Clinton Hotel	2005	\$5,000,000
Cadillac Hotel	2004	\$20,000,000
Ocean Spray Hotel	2004	\$2,828,024
Sharalton Hotel	2003	\$17,932,883
Eastview (Courtyard by Marriott)	2003	\$7,600,000
Chelsea Hotel	2002	\$1,100,000
Nash Hotel	2001	\$3,000,000
Tiffany Hotel	2001	\$3,484,055
Whitelaw Hotel	2001	\$2,000,000
Albion Hotel	1999	\$6,462,693

# Conclusion

To receive a Certificate of Appropriateness, the Historic Preservation Ordinance of the Miami Beach Code requires proposed changes to comply with the Secretary of the Interior's Standards for Rehabilitation. (Sec. 118-564(a)(1)a)

The proposed demolitions, removal of historic layering, and scale of new construction are not in compliance with the Secretary of the Interior's Standards for Rehabilitation Numbers 2, 3, 4, 9 and 10

**Therefore, in accordance with  
the Miami Beach Historic Preservation Ordinance,  
the requested COA should be denied.**