

RE: FILE NO. # HPB21-0498 for 7418 Harding Avenue, Miami Beach, FL 33141

Dear members of the Historic Preservation Board,

I am a concerned citizen who is a property owner on the same street in North Beach as relates to the Certificate of Appropriateness application for HPB21-0498. In my opinion and supported with the 5 enumerated reasons and documentation included in my letter below, some aspects of the 7418 Harding Avenue hotel developer's plans are acceptable and some aspects of the plans are unacceptable. I have reviewed all of the available plans, reports, correspondence and renderings associated to this application.

Mostly, I am appalled that such a project would even be considered in a historic district. This is an outrage. The proposed redevelopment of 7418 Harding Avenue would consist of a 48-room hotel located within a local historic district, the North Shore National Register District. The North Shore historic district of the Miami Beach North Beach neighborhood primarily consists of small garden apartment buildings. This area has a large concentration of well-preserved MiMo-style buildings from the post-WWII era. Yes, the proposed plans for renovation and rehabilitation at 7418 Harding Avenue are appropriate and valid, and yes, the applicant's requested variance regarding the minimum hotel unit size is justified so should be granted. But it stops there. Absolutely not should the applicant's proposed plans for demolition of a contributing historic apartment building and the construction of an overly-tall and overly-modern hotel tower be permitted at this location in a residential neighborhood of a historic district. NO.

I will point out that the big picture issue is that the applicant is proposing to develop "a hotel in a primarily residential neighborhood" (Miami Beach Planning Department's Staff Report & Recommendation by Thomas R. Mooney pre-dated May 10, 2022, page 10) that would involve the demolition of a historic building considered to be contributing structure within a historic district and replaced with a 5 story tall hotel tower with maximum height of 55 feet with a loading zone in a shared communal narrow alley. Simply put, this does not feel right at all. Apply the Secretary of the Interior's Standards for Rehabilitation to the plans for 7418 Harding Avenue. History will surely judge you harshly if the Board approves this application, especially if done so without substantial conditions imposed.

The 7418 Harding Avenue site contains three similarly designed buildings from 1946 arranged around a central garden courtyard fronting onto Harding Avenue. In the application, the two buildings (north and south) that front Harding Avenue are proposed to be retained and substantially restored, which is APPROPRIATE. I AGREE with the plans to renovate and restore the (north and south) historic buildings that are 2 stories tall. This makes sense and will benefit not only the new property owner but also the neighbors too since the historic buildings will look better after being rehabilitated and brought back to their original glory. This aspect of the development plans is valid. The development plans further call for added landscaping plantings, which is also a welcomed improvement. Yet the proposed new pool and deck are not congruent with a historic property and should be denied. However, also in the application, the one historic building (west) in the rear that backs up against the Harding alley is proposed to be a total demolition of the 2 stories tall building with construction of a new addition in its place. I DISAGREE with the plans for demolition of the historic building from 1946 and the construction of a new addition of a hotel tower that is 5 stories tall and is of a modern design of concrete with glass balconies. This aspect of the development plans is invalid and egregiously violates the principles of historic preservation.

1. HOTEL IS OUT-OF-CHARACTER IN IMMEDIATE AREA OF RESIDENTIAL NEIGHBORHOOD

The Secretary of the Interior's Standards for Rehabilitation state that their standards are to be applied to rehabilitation projects, including standard #1 which states: "1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment." The historic use for the 7418 Harding Avenue property is exclusively as multifamily residential apartments. Indeed, the 7418 Harding Avenue property is zoned residential and was never a commercial property or a tourist hotel.

The 7418 Harding Avenue site proposed for redevelopment currently contains, and historically has always contained, 20 multifamily residential units in a garden apartment complex of buildings 2-stories in height surrounding a central courtyard. The proposed redevelopment would instead consist of a 48-room hotel, with one of the buildings being 5-stories tall. Yet, all of the other buildings immediately neighboring the 7418 Harding Avenue property, whether along the west side of Harding Avenue, or along 74th Street or along the alley of Byron Avenue, are all condo complexes containing multifamily residential units in (mostly historic garden-style) buildings of 2-stories tall.

Furthermore, the 7418 Harding Avenue property has a land use designation of Residential Multi-family Low Intensity and is zoned RM-1. Thus, the property SHOULD remain as residential apartments and SHOULD NOT be converted into a hotel. In fact, the Miami Beach Planning Department's Staff Report & Recommendation by Thomas R. Mooney pre-dated May 10, 2022, even notes on page 10 that the applicant is proposing to develop "a hotel in a primarily residential neighborhood".

This block of Harding Avenue x 74th Street, and those blocks surrounding it, are exclusively residential in character. While there is some limited touristy commercial development in North Beach, this is primarily along the busier Collins Avenue located next to the beach. To build a hotel in this particular section of the North Beach neighborhood near Harding Avenue x 74th Street is to disrupt the character of the neighborhood and hence is a detriment to all of the property owners and residents there. This is a convenient yet peacefully quiet area and that is what has attracted the local residents to live there. Thus, to allow a 5-story hotel to be built on this block within the North Shore National Register District is to adversely disrupt this peaceful ambiance and violates the core principles of historic preservation. For this reason, I am strongly OPPOSED to the development of a hotel, regardless of whether or not it is being promoted as a "boutique hotel" IF the hotel's buildings are not rehabilitated and redeveloped in an architectural style, as well as in an appropriate size and scale, that is congruent and consistent to the rest of the neighborhood. To be clear, it is *ONLY IF* the 7418 Harding Ave property's historic buildings are rehabilitated to be tastefully renovated and restored and have their original height of 2 stories retained, then the conversion of a multifamily residential property into a hotel would be deemed acceptable. Otherwise, this redevelopment is strongly OPPOSED by me and violates historic preservation principles.

2. HISTORIC CONTRIBUTING BUILDING SHOULD NOT BE DEMOLISHED

The Secretary of the Interior's Standards for Rehabilitation state that their standards are to be applied to rehabilitation projects, including standard #2 which states:"2. 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 7418 Harding Avenue property has historically been

comprised of a total of three (3) multifamily residential buildings. The applicant's plans for "the total demolition of one building and the construction of a new detached addition as part of a new hotel development on the site" should therefore be denied. The historic buildings in this local historic district give the area its appealing architectural character and should be preserved, as shown in the photo below.



The building located along the western edge of the 7418 Harding Avenue that the applicant has proposed to be demolished is a contributing building in a historic district as defined in section 114-1 of the Land Development Regulations of the Miami Beach Code of Ordinances. A contributing building "means one which by location, scale, design, setting, materials, workmanship, feeling or association adds to a local historic district's sense of time and place and historical development" and "may be contributing even if it has been altered if the alterations are reversible and the most significant architectural elements are intact and repairable." That is absolutely the case with the historic building at 7418 Harding Avenue that contains contributing buildings of historic value!

The Miami Beach Planning Department's Staff Report & Recommendation by Thomas R. Mooney predated May 10, 2022, on page 7 acknowledges that the "existing structures are designated as Contributing within the North Shore Local Historic District" and that the "subject buildings are classified as Contributing buildings in the Miami Beach Historic Properties Database." The Report further states, rightfully, on pages 7 and 8 that the "buildings are of such design, craftsmanship, or material that they could be reproduced only with great difficulty and/or expense", that the "existing buildings are distinctive examples of the Post War Modern style of architecture which contributes to the district", and that the "retention of the buildings is critical to developing an understanding of an important Miami Beach architectural style." Nonetheless, the Report states, wrongfully, on page 8 that "**Satisfied.** The applicant has presented plans as part of this application for the replacement of the Contributing building to be demolished". Yet this is ABSOLUTELY UNTRUE. The applicant proposes the complete demolition of a contributing building (the west building bordering the Harding alley) to be replaced by a hotel tower of 5 stories constructed in an ugly modern design of concrete with glass balconies. This substitution of a modern tower of 5 stories in height built in 2022 in the place of a historic building of 2 stories in height built in 1946 is NOT an equivalent replacement. A new addition does not replace a contributing structure.

3. HOTEL'S 5-STORY ADDITION IS OF MODERN DESIGN SO IS INAPPROPRIATE

The Secretary of the Interior’s Standards for Rehabilitation state that their standards are to be applied to rehabilitation projects, including standard 9 which 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 7418 Harding Avenue applicant’s plans include the “the construction of a new detached addition as part of a new hotel development on the site”, with that new 5-story addition shown in the renderings below from the Architectural Plans Report prepared by MTRR MGMT on March 7, 2022 (Drawing A-16).

Historic preservation helps communities maintain a higher quality of life by preserving its cultural heritage and historic resources for future generations. The scale and massing of new development is required to be consistent with the established context of the existing residential neighborhood and must maintains the low-scale, as-built character of the surrounding neighborhood. The subject property located at 7418 Harding Avenue was built in 1946 and is 2 stories tall. Likewise, the immediate neighboring buildings are also all 2-story low-rise buildings constructed during the 1940s and 1950s. For example, the building located directly next-door to the subject property, the condominium at 7400 Harding Avenue was built in 1948 in the MiMo architectural style and is 2 stories tall. The building across the street at 330 74th Street was built in 1949 and is 2 stories tall. The neighboring building located adjacent at 331 74th St / 333 74th St / 7407 Byron Avenue, was also built in 1948 and is 2 stories tall. The building directly across the alley at 7415 Byron Avenue was built in 1952 and is 2 stories tall. The other buildings directly across the alley at 7425 Byron Avenue and 7435 Byron Avenue were both built in 1950 and are 2 stories tall. Thus, a 5-story addition of modern design of concrete and glass, including with glass balconies, as proposed by the 7418 Harding Avenue applicant does NOT compliment the neighborhood’s buildings or the architectural character of the North Shore Historic District.



ARCHITECT	CONSULTANT	OWNER	PROJECT	DRAWING TITLE	DRAWING #
MTRR MGMT 2121 NE 107 th ST MIAMI FL 33150 www.mtrr.com		-- 7418 HARDING AVE MIAMI BEACH FL 33141	HARDING	RENDERS 2021.12.08 12" = 1'-0"	2109 A-16

Yes, the applicant points to a few select buildings with maximum heights of 55' but these are aberrations in the neighborhood and stick out like sore thumbs! E.g. the buildings located at 7440 Harding Avenue (note this was built in 1980 so before the Historic Preservation Board was established!), 7441 Wayne Avenue (note this was built in 1964 and in fact is geographically situated on Park View Island!), as well as 7330 Ocean Terrace and 7600 Collins Avenue (note which are both high-rises located in touristy areas along the beach!). The only building close to the proposed hotel at 7418 Harding Avenue is the 5-story condo building at 7400 Harding Ave which occupies a corner lot on a wider and busier street (75th Street) and which has a bus stop and trolley stop sited directly at its front lawn, yet this relatively larger building nonetheless still sticks out like a sore thumb in this particular area of the neighborhood which is otherwise comprised solely of 2-story condo/apartment buildings. These select few aberrations, which should not be replicated now, which are the only examples of taller buildings in the neighborhood, are visible in the aerial photograph below in the following section 4.

For this reason, I am strongly OPPOSED to the “total demolition of one building and the construction of a new detached addition as part of a new hotel development on the site” aspect of the developer’s currently proposed plans. This new addition does NOT add a new layer of architectural interest to the historic property. Rather, the tall tower will be a detriment to the architectural interest of the historic property. To be fair, I would consider to be acceptable the other aspect of the developer’s proposed plans, “for the partial demolition, renovation and restoration of two buildings” because those are historic buildings which are 2-stories tall and are similarly sized to the other condo buildings, mostly historic buildings from the post-WWII era, located directly next-door to either side of 7418 Harding Avenue as well as similar in size and scale to all of the other 2-story condo buildings located across the alley from 7418 Harding Avenue and also across the street both along 74th Street and along Byron Avenue.

4. HOTEL IS OF AN INAPPROPRIATE SIZE (MAXIMUM HEIGHT AND TOTAL NUMBER OF UNITS)

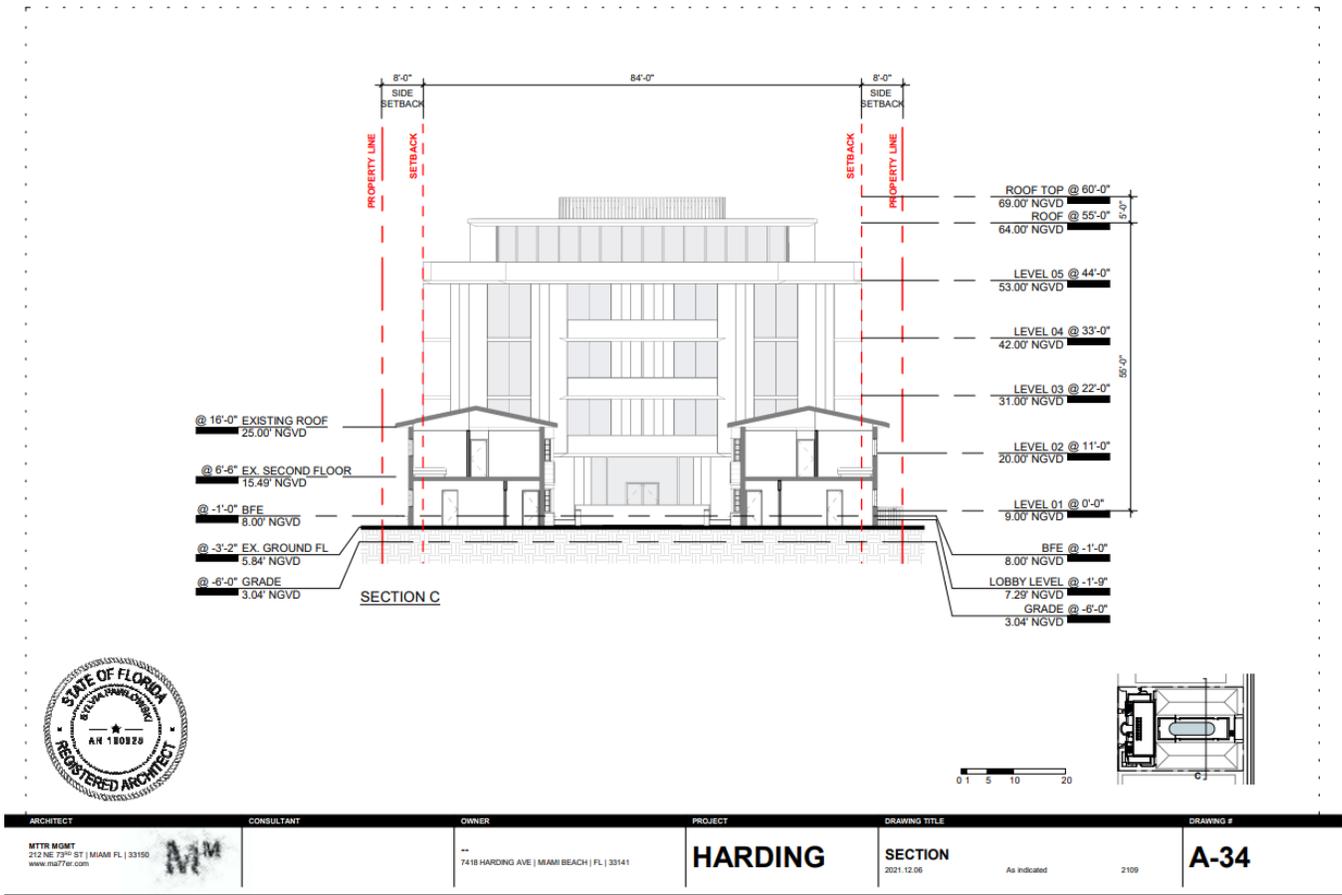
The existing buildings of the 7418 Harding Ave property contain 20 residential units in a garden apartment complex of 2-stories with a maximum height of 25 feet and an existing size of 13,396 sq. ft. The proposed project would contain 48 hotel units, in addition to a lobby/reception area (as well as a new pool and deck) and have a proposed size of 18,705 sq. ft. This hotel complex proposes to have a maximum height of 55 feet and include a new 5-story building. WHY? WHY? Why does the hotel need to have a 5 story tall tower? Why does the building height need to be increased from 25 feet to 55 feet? Why does the square footage need to be increased? The project classifies itself as a “boutique hotel” which implies a small-scale building that blends in. Thus, it should remain as 2 stories tall maximum, without the new addition of a 5 story tall tower. Just because something is allowed by the City Code does not mean that it should actually be permitted by the Historic Preservation Board. A 55 foot tall tower is NOT APPROPRIATE at this site given the neighboring buildings of the historic district. This proposed construction will not be compatible with surrounding properties.

The properties neighboring the subject property at 7418 Harding Avenue are all without exception small multifamily residential buildings containing either condo units or apartment units (1-bedroom or studio units). For example, the multifamily residential building located directly next door at 7400 Harding Avenue is 2 stories tall and contains a total of 24 condo units. The other multifamily residential building

located directly next door at 7434 Harding Avenue is 2 stories tall and contains a total of 12 condo units. The multifamily residential building located adjacent at 331 74th St / 333 74th St / 7407 Byron Avenue, is 2 stories tall and contains a total of 16 condo units. The small scale of the surrounding properties, and those of the entire neighborhood in this area of North Beach, can be seen in the aerial photograph below.



The developer's plans, as shown in the Architectural Plans Report prepared by MTTR MGMT on March 7, 2022 (Drawing A-34) below, show the height of the proposed new addition building literally towering above the existing historic buildings and the neighboring buildings. This is completely unacceptable! As an owner of a condo unit in the historic building located directly next door to 7418 Harding Avenue, I OPPOSE these architectural plans. Yes, of course, the rehabilitation of the historic buildings, which are 2-stories tall, is welcomed by me and many other residents in the local community. I am not opposed to the rehabilitation plans for this particular property, and am not anti-development per se, however the changes to historic structures need to be an improvement, not a diminishment of their architectural character and ambiance. The 7418 Harding Avenue property is located within the Miami Beach North Shore National Register District. Any significant changes made to this property should serve to enhance the local area's historic character, rather than cause a deterioration to it, as would be the case if the developer's plans were to be approved. For this reason, I am strongly OPPOSED to the "total demolition of one building and the construction of a new detached addition as part of a new hotel development on the site" aspect of the applicant's currently proposed plans. The buildings of 7418 Harding Avenue should remain as 2 story with a maximum height of 25 feet, as historically built.



5. USE OF ALLEY IS UNASAFE AND HOTEL'S (ALLEY ARROW) SIGNAGE IS INAPPROPRIATE

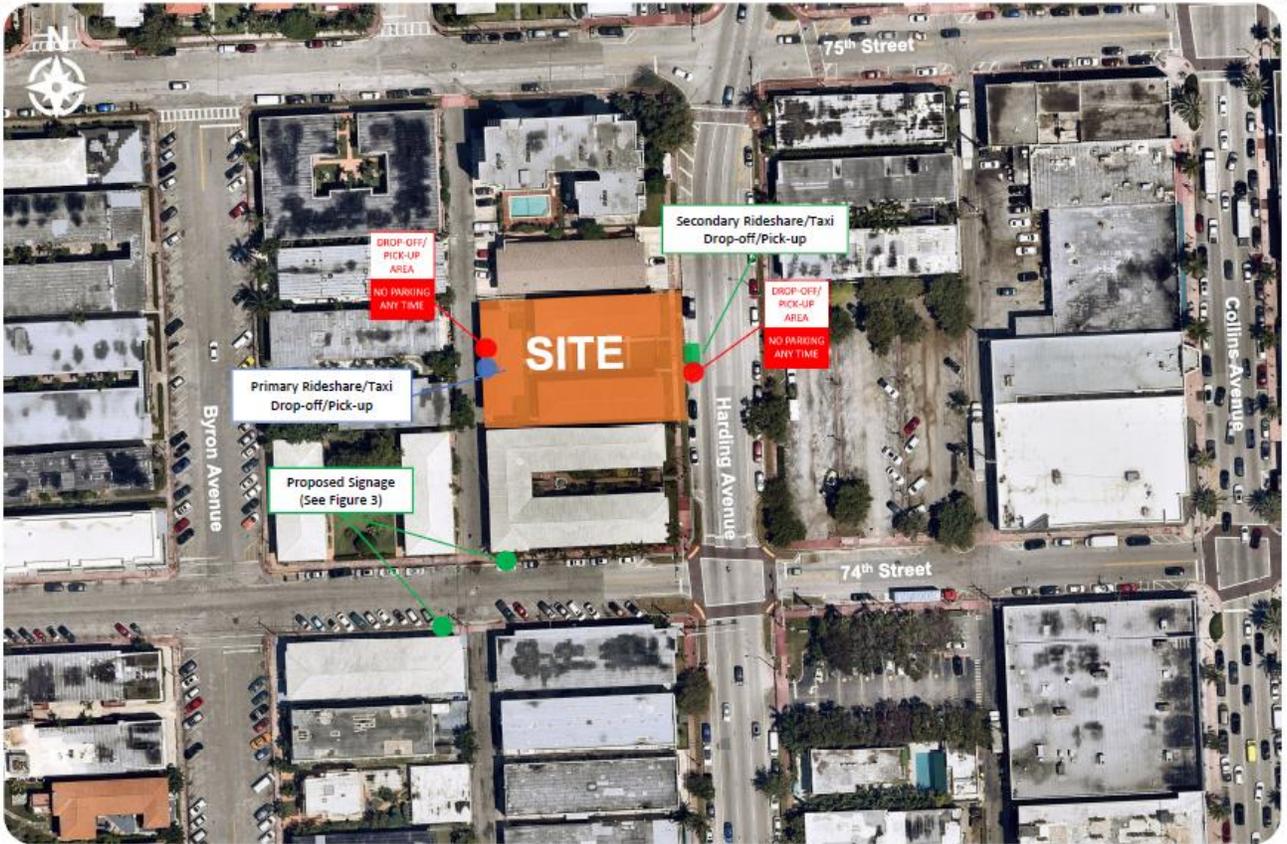
The 7418 Harding Avenue applicant proposes to use the Harding alley as a loading zone. This is a narrow alley that is communally shared by all buildings backing up to the alley, as shown in the photo below. It should not be allowed to be monopolized by a single property owner. The Harding alley is 20' wide and is communal and CANNOT accommodate the loading operations of the Proposed Development. To support the request for a variance, the letter from law firm Bercow Radell Fernandez Larkin Tapanes dated March 7, 2022, states on page 7-8 that "Alleys in commercial areas commonly accommodate short-term loading operations, and the Proposed Development ensures safer operations. The proposed use of boutique hotel will neither require extensive nor frequent loading." This is ABSOLUTELY UNTRUE.

The Miami Beach Planning Department's Staff Report & Recommendation by Thomas R. Mooney pre-dated May 10, 2022, states on page 6: "Access to the site from adjacent roads shall be designed so as to interfere as little as possible with vehicular traffic flow on these roads and pedestrian movement onto and within the site, as well as permit both pedestrians and vehicles a safe ingress and egress to the site. **Satisfied.**" But this is ABSOLUTELY UNTRUE and is *not* satisfied. The hotel's use of the alley will be unsafe.



Furthermore, the applicant proposes placing signage directing vehicular traffic into the Harding alley. However, signage advertising a PRIVATE business should not be allowed to be placed on PUBLIC property like the street sidewalk. This is WRONG! The developer's plans, as shown in the Traffic Assessment Study prepared by Kimley-Horn on January 27, 2022 (Figure 2 and Figure 3) below, show the placement of 2 signs on opposite sides of 74th Street between Harding Avenue and Byron Avenue, indicating the hotel drop-off/pick-up areas with arrows directing vehicles to turn into the alley. This is completely unacceptable. No other local business does this in the neighborhood and it should not be permitted! According to the map (Figure 2), one of the proposed signs will be placed directly beside the building in which I am a unit owner. I am totally OPPOSED to this, as are most of my neighbors. Figures 2 and 3 from the Traffic Assessment Study are shown below, along with a photo image of the relevant alley. The (pale yellow-colored) historic MiMo condo building in which I am an owner, located at 7400 Harding Avenue x 74th Street, directly borders the alley and thus will be negatively impacted by the proposed signage as well as the increased vehicular traffic. Also, too much vehicular traffic in the alley makes it unsafe for pedestrians and bicyclists and all other users (human and animal). Lastly, the hotel's tourists, employees and vendors will take up all of the (already very limited) street parking spots in the neighborhood. This is very unfair to all of the local residents.

For all of the above reasons, the applicant's proposed plans for 7418 Harding Avenue should be approved only if amended to be limited to the restoration of the existing buildings with major conditions imposed.



Kimley»Horn
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Figure 2
Rideshare/Taxi Drop-Off/Pick-Up Location
7418 Harding Avenue
Miami Beach, Florida

Westbound 74th Street
Signage



Eastbound 74th Street
Signage



Kimley»Horn
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Figure 3
Conceptual Sign Detail
7418 Harding Avenue
Miami Beach, Florida