

September 14, 2023

Karen Golonka, Planner
Planning and Zoning
Community Development Department
Town of Lake Park
535 Park Avenue, Lake Park, FL 33403

**RE: Park Building, 918 Lake Park Avenue
Historic Preservation Consulting Services for the Town of Lake Park**

Dear Ms. Golonka:

The Town of Lake Park has engaged R.J. Heisenbottle Architects, PA (RJHA), to conduct a review of the Petition for Removal Report ("Report") for 918 Park Avenue prepared by REG Architects on March 1, 2023. It is our understanding that The Alder at Lake Park LLC ("the Applicant") has submitted a Historic Preservation De-Designation Application for the de-designation of the Park Building at 918 Park Avenue and that the accompanying Report demonstrates that the building no longer meets the criteria under which it was initially designated.

Our review focused on analyzing the information presented in the Report, assessing whether the grounds for de-designation are valid, and making alternate recommendations, if appropriate.

Our analysis concludes that the building has changed little since it was designated in 1998. It maintains its architectural integrity and qualities for which it was listed locally and, therefore, continues to meet the criteria for designation. Our conclusion is based on two critical pieces of information:

1. Photographic evidence from 1950 and;
2. the photographs accompany the National Register Nomination form and the Florida Master Site File.

RJHA does not believe the justifications for de-designation are valid. Although changes were made to the original building, the building was locally designated for its current architectural appearance, except for replacing the second-floor windows with paired six-over-six. The Report references a pre-1928 (hurricane) historic image that represents the original version of the building and compares it to the building designated in 1998. The extant building and its Mediterranean enhancements have looked this way since 1950.

The National Register Bulletin: How to Apply the National Register Criteria for Evaluation states that "buildings can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and used over a period of time."

The Secretary of the Interior's Standards for Rehabilitation provides general guidance for work on historic properties. Standard #4 supports the notion above, "changes to a property that have acquired historic significance in their own right will be retained and preserved."

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Analysis

RJHA requested the Local Designation Report from the Town of Lake Park and was told that the correspondence from when it was locally designated in 1998 references a staff report, which seems limited to the Florida Master Site File. Therefore, RHJA obtained the complete Master Site File from the Florida Division of Historical Resources ("Division") for the Park Building (ID PB9607).

The Florida Master Site File was attached to the National Register of Historic Places Registration Form for the Park Building, prepared on May 31, 1998, as part of the Kelsey City Multiple Property Submission. Division staff noted that the Park Building is not tagged in their database as being listed in the National Register, but the nomination process was initiated at some point. This twenty-one (21) page document includes three (3) photos of the building that demonstrate that it was nominated for its current architectural appearance.

Furthermore, the Narrative of Description of Site section in the Florida Master Site File describes the building as it appears in the photos,

"Built in 1925, the two-story masonry structural system rests on a concrete slab foundation. Exterior walls are surfaced with stucco, and the first floor features corner quoining. The flat portion of the roof features shaped parapets and barrel tile trim. The shed portion of the roof is covered in barrel tile and features pecky cypress brackets. Fenestration includes metal awning and wood-fixed storefront windows. The north façade features inset entrances with arched openings and cast stone-turned columns. The west elevation features a second-story rectangular cut-out which exhibits a balcony and a railing."

The Discussion of Significance notes that the building "retains most of its historic physical integrity and modifications are limited to replacing some original windows." The above narrative describes the existing building as having pecky cypress (wood brackets), inset entrances with arched openings, and cast stone-turned columns.

The Report serves as a formal request and petition to de-designate the Park Building based on the following criteria for removing properties from the National Register (36 CFR Section 60.15):

1. The property has ceased to meet the criteria for listing as a designated historic landmark because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination.
2. Additional information shows that the property does not meet the historic landmark designation criteria for evaluation.

The criteria listed above are specifically for removing a property from the National Register. According to the Division, the park Building is not listed in the National Register of Historic Places. If the criteria were to be applied to the existing building, the property would retain the qualities for which it was listed locally and, therefore, continue to meet the criteria.

According to Chapter 66, Historic Preservation of the Town of Lake Park Code of Ordinances, Section 66-9 allows for Amendment or rescission: "The historic preservation board may amend or rescind any designation provided it complies with the same manners and procedures used in the original designation." While the procedures for designation are clear, the Town needs to define the criteria for local

de-designation. If they are the NR criteria (36 CFR Section 60.15), that should be made clear, and the full Regulation should be provided.

Per the Lake Park Historic Preservation Board Resolution of Designation of 918 Park Avenue dated September 9, 1998, the building was designated for its significance to the early history of Kelsey City; it is the last remaining commercial building of the Old Kelsey City downtown; possesses the Mediterranean Revival architectural features of the Boom Times in Florida in the early 1920s and was built for the Kelsey City development; meets the requirements for designation as described in the Lake Park Historic Preservation Ordinance; and that the people of Lake Park desire to protect and preserve in perpetuity those sites of outstanding historical character.

The Park Building is significant to the Town's history. It possesses its integrity of location, design, setting, materials, workmanship, and association for which it was nominated, and all of the Resolutions are still true.

The Report claims that many significant changes have occurred to the exterior and have destroyed the historic integrity and significance of the building. There is a reference on page 3 that the majority of alterations and additions were built in the 1970s to facilitate the mixed-use commercial aspect of the property. This includes the elimination and disturbance of the original façade facing Park Avenue. However, no primary source information or dates are provided to support these claims. The Report then refers to a historic image on page 8, referred to as a Historic Image Front Façade and uses it to compare the changes between the original façade and the existing façade.

No source information is provided for the image to give the reader confidence and confirm that this is the Park Building. Therefore, RJHA tracked down the source of the image, which is from the Lake Park Historical Society (LPHS). L.J. Parker, President of the LPHS, confirmed that this is the Park Building at 918 Lake Park.

While RJHA can appreciate the completed comparative analysis, it is essential to reiterate that the building retains the historical integrity for which it was nominated and continues to meet the criteria for designation.

Regarding the changes over time, RJHA requested the permit history for the property to understand the façade changes better. There was no information on when the initial changes were made; however, there was information on various repairs and improvements made to the property from 1999 to 2010, including reroofing, structural reinforcing, signage, etc. This research also revealed that two Special Certificate of Appropriateness (COA) approvals were issued for the property on the merits that the changes were consistent with the Mediterranean Revival style described at the time of listing. All changes appear to have been completed, except for returning the second-floor façade fenestration to its original eight-bay configuration with eight separate windows and reconstructing the center roof parapet.

RJHA asked Mr. Parker if he knew when the changes were made to the storefront. He provided a document outlining a timeline of Ownership for the building that includes historic photos, and one of those images is from 1950. Therefore, the changes to the façade were made sometime between 1928 (post-hurricane) and 1950, within twenty-two years of the building being constructed. More research needs to be conducted to understand precisely when the façade was remodeled.

There has been consistent messaging to date with the issuance of approvals for the Special COAs and decisions that have been made on the building's current physical appearance. To change the approach now and allow the de-designation of the building would send mixed and inconsistent messaging to the public.

Should you have any questions or need further clarification of the review, please feel free to contact me.

Sincerely,

R.J. HEISENBOTTLE ARCHITECTS, P.A.



Nina Caruso
Director of Historic Preservation Services