

architecture, planning & design

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SECRETARY OF THE INTERIOR  
STANDARDS FOR REHABILITATION  
JUSTIFICATION STATEMENT

March 30, 2023

City of Delray Beach  
Development Services  
100 N.W. 1<sup>st</sup> Avenue  
Delray Beach, FL 33444

RE: 1180-1190 Nassau Street - 2023-093 & 094  
COA & Variance  
1<sup>st</sup> TAC Comments

To Whom It May Concern:

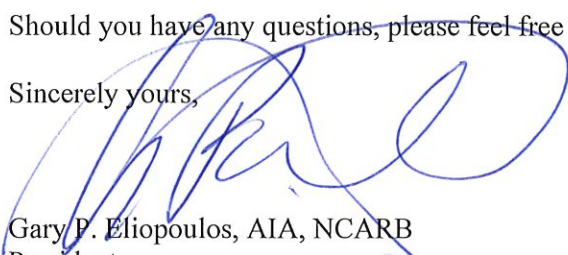
Per LDR Section 4.5.1(E), please find below our responses addressing Secretary of the Interior Standards for Rehabilitation:

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. **This is an existing non-contributing townhouse structure, use to remain multifamily and with the exception of a balcony addition, and existing covered porch enclosure, the exterior envelope is remaining the same (changes equate to approximately 3% of the overall structure). Although we are proposing changes to the existing characteristics of the building, the site and environment will remain unchanged.**
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. **As stated above, this is a non-contributing structure and none of the proposed changes of materials, features, spaces etc. Would be characterized as needed to be retained and preserved.**
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken. **The proposed architectural changes and materials are in no way trying to create a false sense of a historic development but rather will complement the existing character of the historic district.**
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved. **As stated above, this property is non-contributing and will probably always remain that way.**

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved. **Absolutely none exist – maybe if you wanted examples of what not to do.**
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence. **As stated above, there is nothing worth saving and / or restoring on this existing building.**
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible. **All treatment to this building will be undertaken by using the gentlest means possible, not to save any historic features but rather to prevent the building from falling down because of the poorly built structure.**
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken. **All surrounding areas will be preserved as the project only involves changes to the exterior elevations.**
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. **All proposed massing, size and scale shall remain relatively unchanged. We can only hope that the proposed changes will allow you to forget the old.**
10. New additions and adjacent or related new construction shall 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. **Based on the proposed changes to the exterior, it would be relatively easy to return back to the original design / building, but I am not sure why someone would want to.**

Should you have any questions, please feel free to contact me at our office (561) 276-6011.

Sincerely yours,



Gary P. Eliopoulos, AIA, NCARB  
President





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## VISUAL COMPATIBILITY JUSTIFICATION STATEMENT

March 2, 2023

City of Delray Beach  
Development Services  
100 N. W. 1st Avenue  
Delray Beach, Florida 33444

Re: Graham Residence  
1180 Nassau Street  
Delray Beach, Florida 33483

To Whom It May Concern:

This letter is provided to address compliance with Visual Compatibility Standards as per LDR Section 4.5.1(E) (7) and 8 for proposed exterior elevation renovations at the above referenced property, as follows:

We believe the proposed exterior elevations will be consistent with the historic characteristics of the district and this property, and will meet Visual Compatibility Standards as per LDR Section 4.5.1(E)(7)(m):

- a. **Height: The height of proposed buildings or modifications shall be visually compatible in comparison or relation to the height of existing structures and buildings in a historic district** – *The existing non-contributing townhouse structure / roof will not be increased in height.*
- b. **Front façade proportion: The front facade of each building or structure shall be visually compatible with and be in direct relationship to the width of the building and to the height of the front elevation of other existing structures and buildings within the subject historic district** – *The current townhouses were designed in a Mediterranean Style of architecture vs. the proposed exterior façades which are being designed in a Masonry Vernacular Style, which will be visually compatible with the surrounding houses.*
- c. **Proportion of openings (window and doors): The openings of any building within a historic district shall be visually compatible with the openings exemplified by prevailing historic architectural styles of similar buildings within the district. The relationship of the width of windows and doors to the height of windows and doors among buildings shall be visually compatible within the subject historic district** – *All proposed window and door openings are existing, but some are being proposed to be replaced to eliminate the arched headers, which are reflective of the existing Mediterranean Style.*

- d. **Rhythm of solid to voids:** The relationship of solids to voids of a building or structure shall be visually compatible with existing historic buildings or structures within the subject historic district for all development, with particular attention paid to the front facades – *The proposed changes to the elevations help reinforce the rhythm and voids which currently do not exist.*
- e. **Rhythm of buildings on street:** The relationship of buildings to open space between them and adjoining buildings shall be visually compatible with the relationship between existing historic buildings or structures within the subject historic district – *Although the existing townhouses are not historic and are non-contributing, the proposed design will definitely be visually compatible with the historic house located at 226 S. Ocean Blvd. (directly across the street along the north side of Nassau St.).*
- f. **Rhythm of entrance and/or porch projections** – The relationship of entrances and porch projections to the sidewalks of a building shall be visually compatible with existing architectural styles of entrances and porch projections on existing historic buildings and structures within the subject historic district for all development. – *Current design of the non-conforming structure has several balconies / covered porches with no rhythm or sense of consistency. The proposed design will connect them both physically and visually with continuous railings and wrap-around covered shed roof.*
- g. **Relationship of materials, texture, and color:** The relationship of materials, texture, and color of the façade of a building and/or hardscaping shall be visually compatible with the predominant material used in the historic buildings and structures within the subject historic district. – *All proposed materials, textures and colors are being designed to have a direct relationship with the historic district by using smooth stucco to create a strong visual base, “board-and-batten” – Hardie board siding for the upper floors and introducing decorative brackets and outlookers at the new proposed roof overhangs.*
- h. **Roof shapes:** The roof shape, including type and slope, of a building or structure shall be visually compatible with the roof shape of existing historic buildings or structures within the subject historic district. The roof shape shall be consistent with the architectural style of the building. – *For the most part the existing roofs are remaining the same overall shape, but we have introduced “pitch breaks” into the design which helps soften the overall look of the structure – being three stories in height.*
- i. **Walls of continuity:** Walls, fences, evergreen landscape masses, or building facades, shall form cohesive walls of enclosure along a street to ensure visual compatibility with historic buildings or structures within the subject historic district and the structure to which it is visually related. *Existing hardscape and walls are remaining but will be painted “Glacier White” to match the main base color of the townhouses.*
- j. **Scale of building:** The size of a building and building mass in relation to open spaces, windows, door openings, balconies, porches, and lot size shall be visually compatible with the building size and mass of historic buildings and structures within a historic district for all development. *As stated above, the current design of the non-conforming structure has several balconies / covered porches with no rhythm or sense of consistency, the proposed design is proposed to connect them both physically and visually with continuous*



*railings and wrap-around covered shed roof. The actual scale of the building is remaining relatively the same with the exception of the introduction of a "pitch break".*

- k. **Directional expression of the front elevation:** A building shall be visually compatible with the buildings, structures, and sites within a historic district for all development with regard to its directional character, whether vertical or horizontal. – *The character of this project will definitely relate better with the surrounding architecture with a strong smooth stucco base, "board-and-batten" – Hardie board siding for the upper floors and introducing decorative brackets and outlookers at the new proposed roof overhangs with the "pitch break" above.*
- l. **Architectural style:** All major and minor development shall consist of only one architectural style per structure or property and not introduce elements definitive of another style. – *The proposed elements are very consistent with the Masonry Style of Architecture.*
- m. **Additions to individually designated properties and contributing structures in all historic districts:** Visual compatibility shall be accomplished as follows:
1. Additions shall be located to the rear or at least public side of a building and be as inconspicuous as possible.
  2. Additions or accessory structures shall not be located in front of the established front wall plane of a historic building.
  3. Characteristic features of the original building shall not be destroyed or obscured.
  4. Additions shall be designed and constructed so that the basic form and character of the historic building will remain intact if the addition is ever removed.
  5. Additions shall not introduce a new architectural style, mimic too closely the style of the existing building nor replicate the original design but shall be coherent in design with the existing building.
  6. Additions shall be secondary and subordinate to the main mass of the historic building and shall not overwhelm the original building.
- Items 1 through 6 above don't apply – no additions are being proposed.*

The property is located in RM zoning with the following required setbacks:

Front setback: 26'-6"

Side street setback: 10'-0"

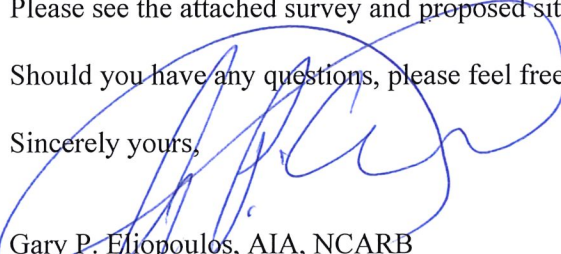
Side interior setback: 15'-0"

Rear setback: 22'-0"

Please see the attached survey and proposed site plan.

Should you have any questions, please feel free to contact me at our office (561) 276-6011.

Sincerely yours,

  
Gary P. Eliopoulos, AIA, NCARB  
President