

COA JUSTIFICATION STATEMENT 212 SEABREEZE AVENUE, DELRAY BEACH JULY 28 2021

Overview-The following Justification statement incorporates the response to the TAC comments from RJ Heisenbottle Architects of June 11, 2021. The statement updates and revises the Justification statement submitted with the new COA application of February 23, 2021. This updated statement includes justification for the partial demolition of the historic structure in accordance with **LDR 4.5.1 (F) Demolitions**, justification for the reconstruction of the existing historic house in accordance with the **Secretary Of The Interior's Standards For The Treatment Of Historic Properties With Guidelines for Reconstructing Historic Buildings** (copy attached at the end of this statement) and the justification for the change in elevation of both the existing historic house and the new addition building slab to 7'-0" NAVD.

Historical Background -The building, known as "The Sewell C. Biggs House" was designed by Paul Rudolph in 1955 as a beach house with no air conditioning, 2 small bedrooms, 2 small bathrooms and a galley kitchen on the elevated 2nd floor consisting of about 1,400 square feet of interior space, with a partially glassed in ground floor entry room built on grade. The remainder of the 1st floor under the elevated 2nd floor house was an open air outside living area. The property was Individually listed to the Local Register of Historic Places in 2005 by the City of Delray Beach.

Two non historic additions were made to the original house in 1981 and 2007 that conflicted with many of the current LDR Development Standards, LDR Visual Compatibility Standards and The Secretary of The Interior Standards. As a result, the historic character of the house was badly compromised. The 1981 and 2007 additions to the house were made at the front and rear respectively, both of which were incompatible with the distinctive design features of the original house.

The Historic Preservation Board granted approval for the demolition of the non historic additions in July, 2018 and the demolition was completed in October, 2018. On May 1, 2019 the HPB approved the COA (2018-191) for the construction of a new 2 story addition and the restoration of the original Paul Rudolph design of the historic house with a glassed in enclosure on the ground floor. Also approved at that time was a waiver to allow the new addition to be constructed in a manner that is not secondary or subordinate to the existing structure, a variance for the pool in the front setback and a variance to reduce the finish floor elevation for the first floor of the new addition to 6'-0" NAVD instead of the required 7'-0" NAVD.

On September 27, 2019 permit plan19-00185798 was submitted to the building department and on February 28, 2020 the building permit was approved. The base of the existing steel columns and pile cap plates were excavated at that time and severe corrosion was discovered. Taylan Kalkan, of Engineering Plus, the project engineer, inspected the corrosion and recommended that the corroded steel be cut out and replaced by new steel, see attached letter. During March 10-11, 2020 the existing structure was raised in order to cut out and replace the damaged steel. While the structure was raised the elevation of the existing finish floor was checked and found to be 5'-9" with the sub floor at 5'-6", not 6'-0" as previously thought. A decision was made in real time to raise the finish floor to 7'-0" by cutting out the section of the existing damaged steel at the base and replacing it with new steel of the same profile 18" longer in order to achieve a 7'-0" finish floor. The elevation change was not approved in advance by the HPB. The justification section for the change in elevation to 7'-0" is based on well founded evidence however the applicant acknowledges the change was made without communication with the City historic preservation staff.

During July 15-16, 2020 the existing glass, louvers, siding, roof and other wood members were removed. A COA for the demolition was not applied for and the demolition was not approved by the HPB. The demolition justification section documents the reasons for the demolition but the applicant accepts that the demolition plans were not made clear to the City historic preservation staff ahead of time.

A stop work order was issued by the building department on August 5, 2020 due to the change in elevation and demolition of more than 25% of the historic structure. Work in progress on the concrete foundation and slab were allowed to be completed. Repairs and preservation treatment on the existing steel structure was allowed to be completed.

Summary of COA-It is important to note that the current COA application proposes substantially the same architectural design for the existing house and the new addition that was already approved in the COA of May 1, 2019. The significant changes in the current COA application are the 7' NAVD first floor elevation for both the existing house and the new addition and the emphasis on reconstruction of the existing historic house, as opposed to repair or restoration. There are several other changes in the plans including grading the property so that the ground floor appears to be more 'on grade' as opposed to sitting on a raised 'plinth', the addition of louvers to the east and west bedroom windows more in keeping with the original design and the relocation of the entry door close to the original location. The COA already approved in 2019 and the current plan's objectives are the same:

- 1) Reestablish Paul Rudolph's elevated 2nd floor design element with the ground floor living room on grade, see photo below of original house as built in 1955/1956.
- 2) Reestablish Vista del Mar S as the "front" or most public side of the house. Vista del Mar S was the original front of the property in 1955/1956. The original address of the property was 1104 S. Vista Del Mar Drive until 1963 when Visa Del Mar was renumbered and the address was changed to 212 Seabreeze Ave. See photo below showing original Vista del Mar S front view and a rendering of proposed contemporary reconstruction of the front side.



ORIGINAL DESIGN BY ARCHITECT PAUL RUDOLPH, 1955



PROPOSED RECONSTRUCTION OF ORIGINAL DESIGN, 2021

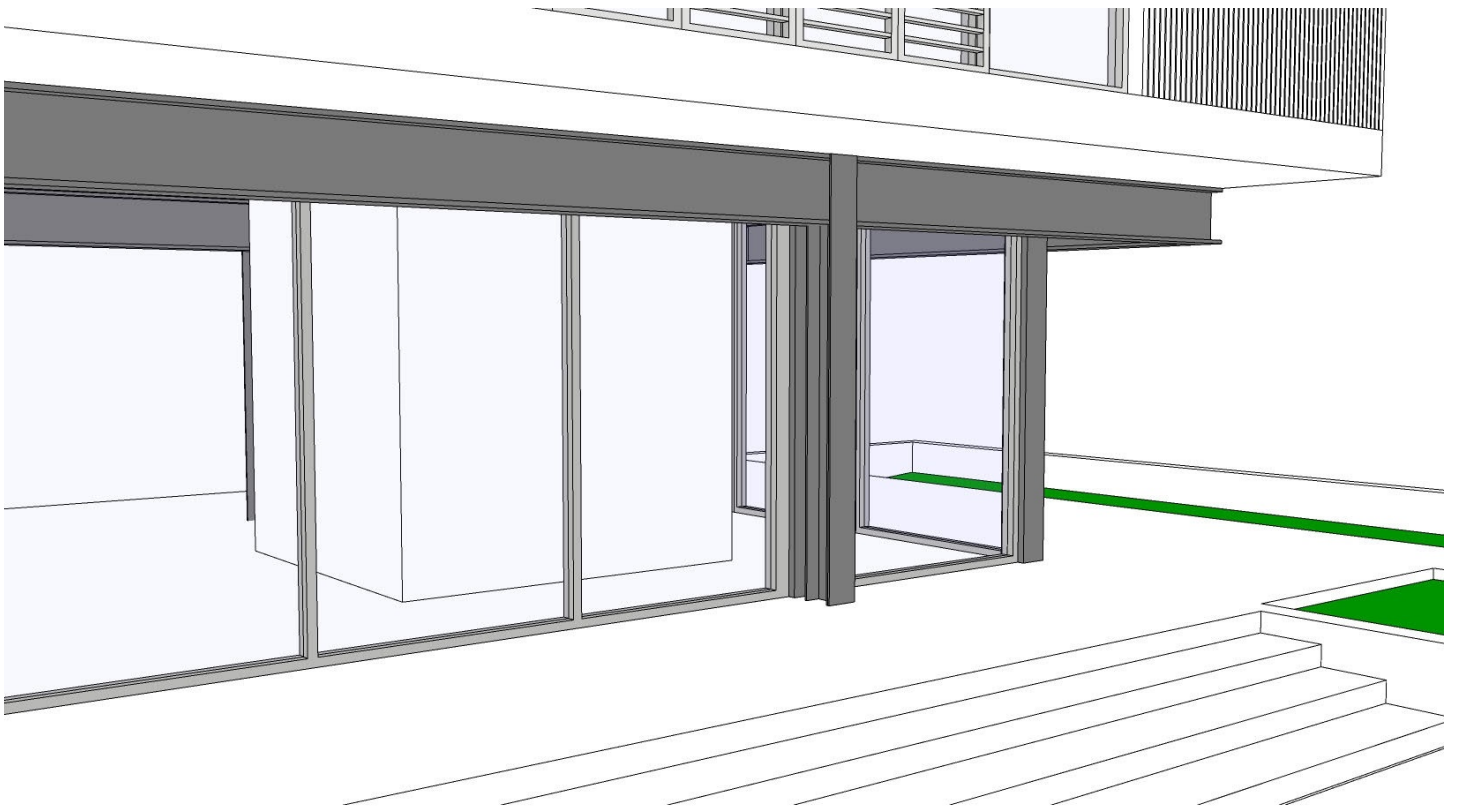
3) Enclose the ground floor living area as a recessed glass box, inside the existing steel columns, allowing for air conditioned living space available year round while retaining the appearance of the original “floating box” 2nd floor structure. See photo below of the original partially glass enclosed ground floor vestibule recessed inside the steel columns and built on grade in 1956. The proposed glass enclosed ground floor living space is also built on grade and recessed inside the existing steel columns, consistent with the character of the original design.



ORIGINAL GLASSED IN VESTIBULE 1955

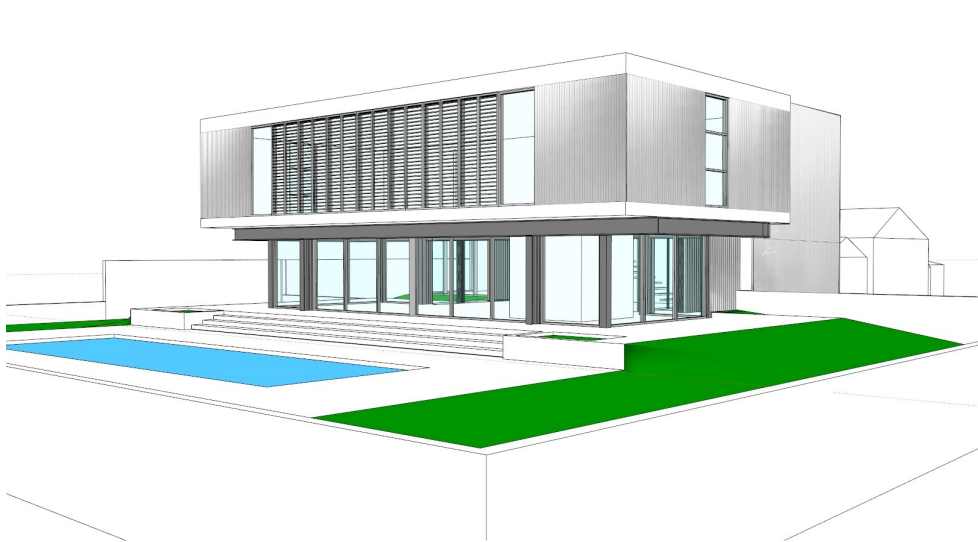


ORIGINAL GROUND FLOOR 1955

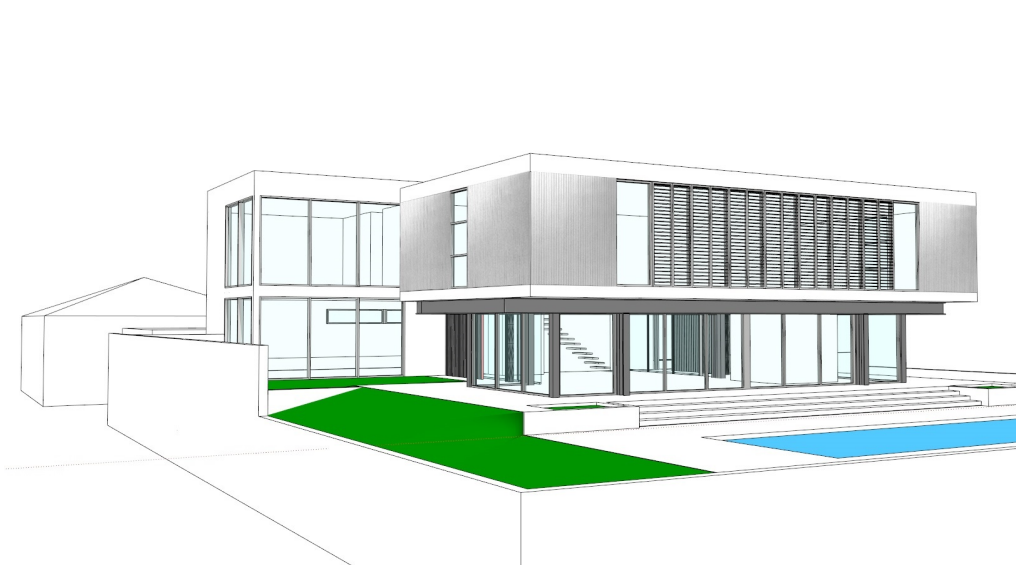


PROPOSED GROUND FLOOR GLASS ENCLOSURE

4) Design and build a compatible addition, connected to the historic house by a 'bridge', in the southeast rear corner of the property largely hidden from the most public Vista del Mar view and also partially hidden from view on the Seabreeze street side of the property as well.



PROPOSED NW VISTA DEL MAR VIEW RENDERING



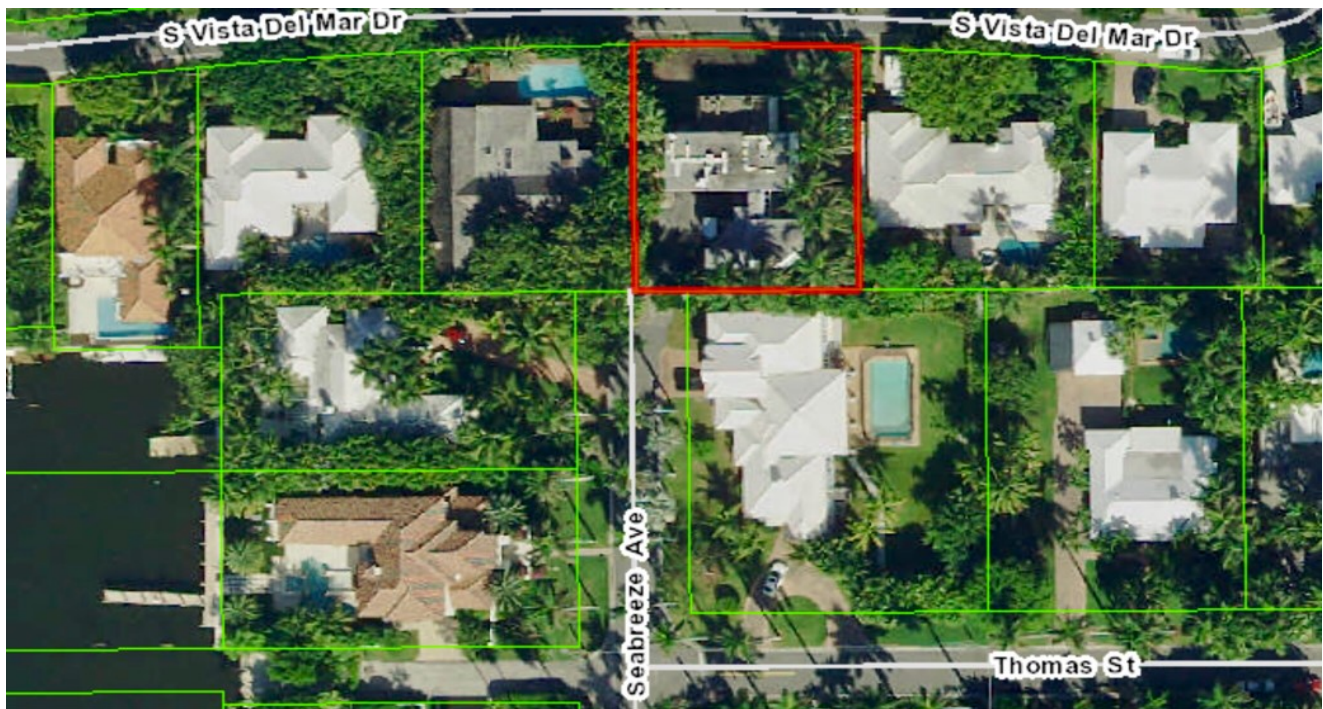
PROPOSED NE VISTA DEL MAR VIEW RENDERING



PROPOSED EAST VIEW RENDERING



PROPOSED WEST VIEW RENDERING



Proposed location of new addition in 'landlocked' southeast corner of property, partially blocked from pedestrian view of Seabreeze Avenue.



PROPOSED SEABREEZE SOUTH VIEW RENDERING

JUSTIFICATION FOR THE DEMOLITION

Please see the following photo documentation and supporting professional engineer's reports describing what happened to the structure after the May 1, 2019 COA approval. A full understanding of what occurred and why is necessary in order to consider the demolition justification. Although there is solid evidence to support the demolition and removal of the various building elements that was executed in July, 2020, the demolition itself was done without the advance knowledge of and approval of the HPB.

The photo documentation and engineer's reports on the following pages document the existing conditions pre demolition and support the demolition steps already taken. The professional engineer concluded in the report titled **'Evaluation Of Existing Building Structure'**, attached, that the **"Overall condition of the structural members and their connections are totally compromised and their condition is below the level of basic safe environment for occupation and current building code requirements...life and service expectation of the building structure is beyond repair. It should be emphasized that any effort for retrofitting and strengthening will not be adequate enough to structurally utilize the existing conditions. New structural component of the building shall be properly erected and connected as per permitted structural plans that are a part of the construction plans approved by the Delray Beach Building department in order for this building to meet requirements of current Florida Building Code and to be structurally sound and safe."**

In the opinion of the project engineer, Engineering Plus, and the project architect, Silberstein Architecture, the structural and architectural permit plans submitted to the building department in September, 2019 and approved in February, 2019 adequately showed the construction of the new structural components in the structural plans and the new exterior materials in the architectural plans. However, the applicant acknowledges that plans were not made sufficiently clear to the City historic preservation staff. In addition, although the engineer, architect, contractor and applicant knew that new glass, louvers, siding, roof and wood members were a part of the building plans, requiring the removal of the old materials, it was not clear ahead of time that the rapid and complete removal of the old materials was going to occur all within hours. Although obvious in hindsight, the applicant did not visualize in advance that the rapid removal and demolition of all the old components would occur simultaneously and result in the post demolition appearance of the naked steel structure seemingly overnight.

The specific materials and building elements are listed below with the reasons justifying the demolition and removal:

Removal Of The Existing Roof-The existing roof had major structural issues, was not built to code and was deteriorated beyond repair. Additional damage over time caused by the improper installation of AC equipment on the roof and poorly executed attempts to repair and resurface the roof by previous owners compounded the problem to the point where the roof could not be saved. The engineer observed in the report titled **'Evaluation Of Existing Building Structure'**, **"damage at structural wood members at roof level... (roofing, rafters, roof sheathing) ...at excessive levels where total section loss and loss of strength are observed and I recommend total removal of the damaged roof...and rebuild the structure as per permit plans issued by the City of Delray Beach Building Department"**.

Removal Of The Existing Glass-The existing glass openings incorporated a mixture of non original glass and non original openings and did not comply with current building code. All of the glass was already approved to be replaced by new glass in the COA approved on May 1, 2019. Specifically, the existing glass needed to be removed on the front, Vista del Mar, north side in order to restore the characteristic original design opening. The existing glass on the east and west sides needed to be removed due to the fact that the existing openings did not comply with current code to allow egress from the bedrooms. The glass on the south side needed to be removed due to the addition bridge which connects across the rear side of the building. All of these points were disclosed and noted in the COA plans approved on May 1, 2019.

Removal Of The Existing Louvers-The existing louvers were non original, were not code compliant and did not match the original design louver arrangement. Please see the photo showing the name 'Courtenay' marked on the louvers indicating that the louvers were manufactured and installed by the owners Virginia and Erskine Courtenay sometime after they purchased the property in 1973, probably in 1980/1981 when the first renovation and addition was built. The louver sections and window opening arrangement was changed when the 1980/1981 addition was built and non original alterations were made at that time. See photo documentation. New louvers were noted in the COA plans approved on May 1, 2019.

Removal Of The Existing Wood Members-The engineer observed in the report titled '**Evaluation Of Existing Building Structure**', "**damage at structural wood members... at second floor (wall studs, fascia, sub fascia, sills, headers, jambs and rim and wall sheathing) at excessive levels where total section loss and loss of strength are observed, I recommend total removal ...of the second floor wall system and rebuild the structure as per permit plans issued by the City of Delray Beach Building Department**". In addition, "**Until necessary demolition is performed on the upper level of the building the damaged steel structure cannot be fully accessed. Appropriate steel structure repairs shall be applied on the existing steel beams as per repair details provided and repairs shall be executed by certified welders.**" In other words, the existing wood members sat directly on top of the existing steel beams so the wood members needed to be removed in order to properly repair, treat and preserve the existing steel beams.

In addition to the demolition of the existing materials that occurred in July, 2020, it has become apparent since then that there are two specific areas where additional work has become necessary.

Replacement of two of the existing steel beams-Due to significant deterioration of the existing steel structure, we applied for and received HPB approval on January 12, 2021 for steel repairs and the application of anti corrosion treatment to the existing steel structure, see '**Typical Existing Steel Repair Details**' report from Engineering Plus, attached. During the repair work it was discovered that the existing steel beams at the east and west side of the building had deteriorated beyond repair and would need to be replaced, see the structural engineer's report '**Structural Requirement for Replacing Existing Steel Beams at East & West Side of the Existing Building**', attached. The proposed replacement steel beams would have the same profile, specifications and dimensions as the existing steel beams so there would be no visible difference upon completion. There is no alternative to replacing the two compromised steel beams that "**are deteriorated beyond safe and structurally sound repair due to excessive section losses.**"

Replacement of the existing wood floor joists-Due to age and prolonged exposure, the existing wood floor joists have deteriorated to the point where they are beyond repair and are not structurally sound and therefore need to be replaced. Please see the attached engineer's report titled '**Evaluation Of Existing Floor System**' which states "**Since the damage at structural wood members of floor level (including floor rafters and sheathing) at excessive levels due to total section losses and loss of strength, I recommend removal of the existing floor system in entirety and rebuild the floor structure with new wood members designed with the current Florida building code requirements**".

The proposed replacement of the two steel beams and the wood floor joists is shown in the revised **S-2 Floor Framing Plan**, submitted as part of the combined set of plans.

The COA for demolition complies with **LDR 4.5.1 (F)** as follows:

Section 4.5.1 (F) Demolitions

(1) Demolition of historic or archaeological sites, or buildings, structures, improvements and appurtenances within historic districts shall be regulated by the Historic Preservation Board and shall be subject to the following requirements: No structure within a historic district or on a historic site shall be demolished before a Certificate of Appropriateness has been issued pursuant to Section 2.4.6(H). **Applicant acknowledges COA for demolition is required and is seeking COA 'after the fact'.**

(2) The application for a Certificate of Appropriateness for demolition must be accompanied by an application for a Certificate of Appropriateness for alterations to the structure or the redevelopment of the property. **The COA application contains revised plans for review and approval.**

(3) Demolition shall not occur until a building permit has been issued for the alterations or redevelopment as described in the applicable Certificate of Appropriateness. **COA application is seeking approval after partial demolition and removal of materials occurred. A revised building permit and a demolition plan have been submitted to the building department.**

(4) All structures approved for demolition and awaiting issuance of a building permit for the alterations or redevelopment shall be maintained so as to remain in a condition similar to that which existed at time that the Certificate of Appropriateness for demolition was approved unless the Chief Building Official determines that an unsafe building condition exists in accordance with Section 4.5.3(G). **Remaining steel structure rehabilitation and preservation is complete but all other work is on hold.**

(5) A Certificate of Appropriateness for demolition of 25 percent or more of contributing or individually designated structure shall be subject to the following additional requirements: (a) A demolition plan shall accompany the application for a Certificate of Appropriateness for demolition. The plan shall illustrate all portions of the existing structure that will be removed or altered. (b) The Certificate of Appropriateness for demolition and the Certificate of Appropriateness for alternation or redevelopment shall meet the "Additional Public Notice" requirements of LDR Section 2.4.2(B)(1)(j). **Our COA application includes the demolition plan D1.0 by Silberstein Architecture, dated July 9, 2021 and the Public Notice Documents noted on the COA check list.**

(6) The Board upon a request for demolition by a property owner, shall consider the following guidelines in evaluating applications for a Certificate of Appropriateness for demolition of designated historic sites, historic interiors, or buildings, structures, or appurtenances within designated historic districts; (a) Whether the structure is of such interest or quality that it would reasonably fulfill criteria for designation for listing on the national register. (b) Whether the structure is of such design, craftsmanship, or material that it could be reproduced only with great difficulty or economically nonviable expense. (c) Whether the structure is one of the last remaining examples of its kind in the designated historic district within the city. (d) Whether retaining the structure would promote the general and value of a particular culture and heritage. (e) Whether there are approved plans for immediate reuse of the property if the proposed demolition is carried out, and what effect those plans will have on the historic district designation or the individual designation of the property. **The existing structure is already individually designated as historic. The complete demolition or relocation of the existing house is not under consideration. The properly executed rehabilitation and reconstruction of the existing house, if approved, will enable the property to continue to be listed as a historic resource on the Delray Beach Local Register of Historic Places.**

(7) No decision of the Board shall result in undue economic hardship for the property owner. The Board shall determine the existence of such hardship in accordance with the definition of undue economic hardship found in Section 4.5.1(H). **If the COA is not granted and there is no viable alternative, economic hardship to the owner is likely.**

(8)The Board's refusal to grant a Certificate of Appropriateness requested by a property owner for the purpose of demolition will be supported by a written statement describing the public interest that the Board seeks to preserve. **In this case it would not be in the public interest to refuse to grant the COA. The existing structure is not structurally safe or sound and as it continues to deteriorate it creates an eyesore in the neighborhood. The proposed architectural plans for the rehabilitation and reconstruction of historic house are essentially the same as what has already been approved and are the only practical and historically appropriate way to reconstruct the original Paul Rudolph design. The only other alternatives would be to abandon or sell the property or to follow the procedure to revoke the historic designation. None of the alternatives would be in the public interest or in the interest of the owner.**

(9)The Board may grant a certificate of appropriateness as requested by a property owner, for demolition which may provide for a delayed effective date. The effective date of the certificate will be determined by the Board based on the relative significance of the structure and the probable time required to arrange a possible alternative to demolition. The Board may delay the demolition of designated historic sites and contributing buildings within historic districts for up to six months while demolition of non-contributing buildings within the historic district may be delayed for up to three months. **Partial demolition has already occurred.**

(10)Request for demolition justification statement. A justification statement shall accompany the application for a Certificate of Appropriateness for demolition of any contributing structure in a historic district or individually designated historic structure. The justification statement must include the following: (a) A certified report from a registered architect or engineer which provides documentation explaining that the building is structurally unsound and is damaged beyond the ability to repair it at a reasonable cost. The report must include photographs to substantiate the damage. **The COA application includes the certified report from the structural engineer, Engineering Plus, documenting that due to the advanced deterioration of the building elements, the structure is not safe and sound and is damaged beyond the ability to repair at a reasonable cost. See supplemental attachment.**

(b) A certified report from an engineer, architect, general contractor, or other qualified professional which documents the projected cost of repairing the structure and returning it to a safe and habitable condition. **The COA application includes the certified report from GLM Builders, Inc that documents the costs to repair and to reconstruct the structure to a safe and habitable condition, see supplemental attachment.**

(c) An appraisal of the property in its current condition, its value as vacant land and its potential value as a preserved and restored historic property. **The COA application is awaiting a property appraisal of the property in its current condition, its value as vacant land, and its potential as a restored historic property, from David Aucamp, Aucamp, Dellenback & Whitney.**

(d)Documentation that reasonable efforts have been made to find a suitable alternate location for the structure within the City of Delray Beach to which the contributing/individually designated historic structure could be safely relocated. (e)Documentation that the applicant or property owner has taken such steps as it deems necessary to preserve the structure requested for demolition including consultation with community groups, public agencies, and interested citizens, recommendations for acquisition of property by public or private bodies, or agencies and exploration of the possibility of moving one or more structures or other features. **No effort was made to find a suitable alternate location because relocation was never an option. Relocation was not considered in place of the selective demolition due to the fact that the existing structure has primary historic significance in it's current location where it was originally designed and built and moving the structure would detract from it's historic context. The Secretary Of The Interior Standard's For The Treatment Of Historic properties defines 'reconstruction as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and *in its historic location.*' From a practical point of view it would be difficult if not impossible to excavate the entire steel structure and move it to a new location without risking major structural damage. Even if a relocation was possible the advanced state of deterioration of the building elements would require the same removal and reconstruction that we are now**

proposing just being done at another location. A rehabilitation of the existing steel structure in place and a reconstruction of the historic house is considered the best and only reasonable option.

(11)Salvage and recordation of historic structures.(a)The property owner shall contact the Delray Beach Historical Society for the purpose of salvaging and preserving specified classes of building materials, architectural details and ornaments, fixtures, and the like for reuse in the restoration of the other historic properties. Confirmation of such efforts shall be provided in a written statement and submitted with the other demolition application prior to consideration by the Historic Preservation Board. (b)The Board may, with the consent of the property owner, request that the Delray Beach Historical Society, or the owner, at the owner's expense, record the architectural details for archival purposes prior to demolition. i. The recording may include, but shall not be limited to photographs, documents and scaled architectural drawings to include elevations and floor plans. ii. One copy of the recording shall be submitted to the City's Planning and Zoning Department, and one copy shall be submitted to the Delray Beach Historical Society for archiving purposes.**Photographs of the original house from 1956 and later additions in 1981 and 2007 are available to reference the historical record. Documentary photographs have been taken by the owner that detail the project timeline from the inception of the project to date. Regarding the salvage of materials already removed, evidence strongly suggests that the existing glass and louvers were not a part of the original construction from 1956. Removal of the glass and non historic louvers was included in the COA of May 1, 2019. The existing wood elements such as the fascia, grooved wood siding and roof had deteriorated beyond repair as documented with photographs and the report from the structural engineer, and were not saved except for samples of the wood siding that will enable the characteristic design features to be reconstructed in the original dimensions and specifications. Note-There is evidence on the City of Delray Beach permit history website that the original roof had been replaced and or resurfaced 4 times and the original siding had been replaced in 1994, in addition to the introduction of new siding during the 1980/1981 renovation.**

JUSTIFICATION FOR THE RECONSTRUCTION

The concept of reconstruction, as it applies to the proposed work on the Sewell C. Biggs House, was introduced in the **Evaluation of COA Approval**, the plan review report dated September 15, 2020, by **Richard J. Heisenbottle, R.J.Heisenbottle Architects**, the expert architect retained by the City of Delray Beach to evaluate the status of the project at 212 Seabreeze Avenue. The reconstruction of the original historic house design using new materials and features, as opposed to restoring or repairing existing materials that were damaged beyond repair, was also suggested in our original Justification Statement for the COA approved May 1, 2019. Our proposed work will be consistent with **The Secretary of the Interior's Standards for the Treatment of Historic Properties** and **Standards for Reconstruction & Guidelines For Reconstructing Historic Buildings**, a copy of which is attached to the Justification Statement.

The Secretary of the Interior's Standards for the Treatment of Historic Properties defines “**Reconstruction as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.**”

Further, reconstruction as a treatment is considered appropriate and acceptable by The Secretary Of The Interior Standards For Reconstruction “**When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment.**”

As per Heisenbottle in the plan review report, “**the operative words that allow reconstruction as an acceptable treatment for the missing characteristic features of the Biggs House, the siding, windows, doors and louvers, is the existence of physical evidence to permit accurate reconstruction with minimal conjecture. Moreover, such reconstruction is essential for the public understanding of the property.**”

The Secretary Of The Interior’s Standards for Reconstruction are applied taking into consideration the economic and technical feasibility of each project. The Standards are listed below along with how they apply to our proposed work:

1. **“Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property”.** In the case of the Sewell C. Biggs House located at 212 Seabreeze Avenue there is good photographic evidence of the original house as built in 1955/1956; the original steel structure is mostly intact and samples of other characteristic materials and features such as the grooved wood siding have been saved. The physical and photographic evidence allows the proposed reconstruction to accurately depict the original design by Paul Rudolph.
2. **“Reconstruction of a landscape, building, structure or object in it’s historic location will be proceeded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction.”**-According to Heisenbottle’s plan review this is not applicable to this matter.
3. **"Reconstruction will include measures to preserve any remaining historic materials, features and spatial relationships."** As noted by Heisenbottle in the first plan review report, “the home’s most characteristic features, the exposed steel column and beam structure remain intact and will be rehabilitated”. Although the entire existing steel structure has been elevated to mitigate the risk of rising sea levels and

coastal flooding, the original dimensions, proportions and spatial relationships of the historic house have been preserved. However, all of the other wood elements as well as the grooved wood siding were damaged beyond repair and removed during the partial demolition. During the proposed reconstruction, the original design features and dimensions will be restored and matched as close as possible to the original design with the use of new materials to replace the damaged materials that had deteriorated to the point where they were not usable.

4. **“Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.”** Based on the photographic evidence and the existing material samples saved, the materials used in the proposed reconstruction will in fact match the original materials removed as close as possible with regard to composition, design, color and texture. No conjectural designs or new man made materials will be introduced to replace original natural materials.
5. **“A reconstruction will be clearly identified as a contemporary re-creation.”** We will identify the reconstruction as a contemporary re creation by means of appropriate signage at the site, as per the guidelines and recommendations of the Secretary of the Interior. A temporary sign will be located at the site during construction showing a photo of the original house as built in 1956 and a rendering of the proposed contemporary re creation dated 2021. Upon completion, a permanent exhibit by means of a sign, plaque or display will clearly identify the contemporary reconstruction in order to assist in the public’s understanding of the property.
6. **“Designs that were never executed historically will not be constructed.”** We will not construct designs that were never executed historically.

The Secretary of The Interior’s Standards for Reconstruction & Guidelines For Reconstructing Historic Buildings states an important recommendation for **“Researching and documenting the property’s historical significance, focusing on documentary and physical evidence which is needed to justify reconstruction of the non-surviving building”**. Our proposed work is based on years of research and documentation of the original design and detailed knowledge of the existing structure.

The Secretary of The Interior’s Standards for Reconstruction & Guidelines For Reconstructing Historic Buildings also states another directly relevant recommendation regarding **“Reconstructing a non-surviving building to depict the documented historic appearance. Although the use of the original building materials (such as masonry, wood, and architectural metals) is preferable, substitute materials may be used as long as they recreate the historic appearance.”** With the important exception of the original existing steel structure which has been rehabilitated and preserved, the proposed work is based on using substitute materials that are as close as possible to the original in appearance, dimension and specification with allowance being given only for availability and compliance to current building code. It is important to note that in the opinion of Mr Heisenbottle, **“when completed, the properly executed rehabilitation and partial reconstruction can continue to be listed as a historic resource on the Delray Beach Local Register of Historic Places”**.

An indication of how the proposed building would be consistent with both the Secretary Of The Interior's Rehabilitation Standards and The Secretary Of The Interior's Reconstruction Standards was stated in the COA Justification Statement that was part of the COA approved on May 1, 2019 as follows:

Rehabilitation Standard 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" The existing steel structure will be repaired and rehabilitated, not replaced. The characteristic features of the historic house such as the 3" grooved wood siding will be repaired and restored and if damaged beyond restoration, will be replaced with matching material of the same specification. The existing fixed glass and 24" louvered panels, which do not meet code and are of varying color and quality will be replaced with clear, impact glass and louvers consistent with the original design of the house with respect to specification, size and proportions. All restoration, repair and replacement work will be guided by the photo's of the house as built in 1956.

The removal and reconstruction of the existing glass, louvers, rotten wood and siding should be evaluated against the above standard. We have preserved and rehabilitated the existing steel structure, a critical and unique design characteristic of the historic house. The rehabilitated steel structure combined with the properly executed reconstruction of the exterior siding, windows, window treatments, and finishes will work together to faithfully bring back the original design characteristics of the historic house.

We have extensive contemporary and historic photographic evidence documenting the existing materials and features of the house since it was built in 1956 and recent photographs of the existing house before the existing materials were removed so that the proposed reconstruction will be accurate and appropriate. For example, the glass, louvers and siding removed from the north, most public elevation along Vista del Mar did not match the original historic opening sizes and locations, was not to code and was of non uniform color and type. See photos showing the non historic alterations made to the glass, louvers and siding across the front facing Vista del Mar opening prior to demolition and removal.

The replacement glass proposed is clear, impact glass that meets code and re establishes the original openings and design. The new proposed glass for all the openings was described in the glazing schedule shown on sheet A1.2 as part of the original COA granted May 1, 2019. The existing louvers were not the original historic louvers but were added sometime after 1973 when the house was purchased by Courtenay. The Courtenay name was marked by the manufacturer on the louvers that were removed and stored at the site, see photo attached. We will source aluminum louvers that match as close as possible what was used in 1956. The plywood siding removed was damaged beyond repair as shown in the photo's. We have retained samples of the plywood in order to accurately reconstruct the grooved wood dimensions. Evidence on the City of Delray Beach permit history website suggests the siding had been replaced at least once. The photos also shows the grooved plywood siding that was installed during the 1980/1981 renovation, partially closing up the original opening, also suggesting that much of the siding was not original.



NON HISTORIC GLASS, LOUVERS, SIDING, & DECK ADDED IN 1980/1981



VISTA DEL MAR FACADE BLOCKED BY 1980/1981 ADDITION



NON HISTORIC COURTENAY LOUVERS



Successfully reconstructed historic buildings that follow the above noted Reconstruction Standards & Guidelines are amongst the most historically significant designs by the most highly regarded architects of the modernist movement, including Paul Rudolph and Mies van der Rohe.

Paul Rudolph's "Umbrella House" designed and originally built in 1953 in Sarasota, Florida stands today as one of the architect's most iconic designs. The most characteristic feature of the house, the "umbrella" made of wood that shaded the house and pool from the tropical sun, was destroyed in a hurricane in 1966 but was **completely reconstructed in 2015 using newly engineered and fabricated materials.**



UMBRELLA HOUSE DESIGNED BY PAUL RUDOLPH 1953
RECONSTRUCTION 2015, PRIVATE TOURS BY SAF



UMBRELLA HOUSE DESIGNED BY PAUL RUDOLPH 1953
RECONSTRUCTION 2015, PRIVATE TOURS BY SAF

Mies van der Rohe's "Barcelona Pavilion", an emblematic design of the modernist movement, was created for the German National Pavilion for the 1929 Barcelona International Exhibition. It was dismantled in 1930 and all the original materials were subsequently lost or destroyed. **A reconstructed version of the original design was completed in 1986 at the original site using all new materials** and is now considered to be one of the most significant modernist buildings in the world, despite the fact that it is a total reconstruction. Paul Rudolph remarked that "The Barcelona Pavilion affected me emotionally. It is one of the great works of art of all time".



BARCELONA PAVILION DESIGNED BY MIES VAN DER ROHE 1929
RECONSTRUCTION COMPLETED 1986, MUSEUM TOURS ONLY



BARCELONA PAVILION DESIGNED BY MIES VAN DER ROHE 1929
RECONSTRUCTION COMPLETED 1986, MUSEUM TOURS ONLY

The Palace of Fine Arts was designed by Bernard Maybeck and built for the 1915 Panama-Pacific Exposition in San Francisco. The building was not torn down after the exposition, and it eventually fell into ruin. In 1964, **all but the steel structure was demolished, and the building was reconstructed** with lightweight poured-in-place concrete



[8] The Palace of Fine Arts was designed by Bernard Maybeck and built for the 1915 Panama-Pacific Exposition in San Francisco. The pavilion was intended to be temporary and, although it had a steel structure, the exterior was finished only with stucco, an impermanent material composed of plaster and fiber. The building was not torn down after the exposition, and it eventually fell into ruin. In 1964, all but the steel structure was demolished, and the building was reconstructed with lightweight poured-in-place concrete. *Photo: KevinCole at Wikimedia Commons.*

The examples above have a common theme that are applicable to the proposed reconstruction at Paul Rudolph designed Sewell C. Biggs house at 212 Seabreeze Avenue. The significance of the historic building is based on the innovative and unique **design** of the structure, not necessarily the actual original materials used to construct it. Paul Rudolph often used commonly available, inexpensive materials in the construction of his early Florida tropical modern houses. For example, the use of plywood in the house at 212 Seabreeze. While the use of cheap materials enabled Rudolph to experiment and quickly and cheaply design and build a variety of innovative homes, the materials were not designed or engineered to last, particularly in the tropical Florida coastal environment. Reconstruction is a particularly appropriate treatment for the Sewell C. Biggs house as the house was originally constructed out of materials that could not possibly be expected to last until present day. It is important to note that the Sewell C. Biggs house proposed reconstruction has the added challenge of needing to be built to current code for occupancy as a residential family home. The examples cited are in effect museum buildings which are not to code and cannot be lived in on a permanent basis. It is especially relevant in our reconstruction that the issue of building to current code is noted by **The Secretary of The Interior Standards For Reconstruction** as follows, **“Whereas preservation, rehabilitation, and restoration treatments usually necessitate retrofitting to meet code requirements and to address other issues (including natural hazards and sustainability), in this treatment it is assumed that the Reconstructed building will be essentially new construction. Thus, code-required work, treatments to reduce the potential impact of natural hazards, and ensuring that the reconstructed building is as sustainable as possible should be considered during the design phase—when appropriate to the particular Reconstruction project—so as not to negatively impact or detract from the reconstructed appearance of the building, its site, and setting. The fact that the non-surviving building was located in a floodplain or another area especially vulnerable to the impact of natural hazards is crucial to consider when determining whether the building should be reconstructed.”** Our proposed plans are based on building to current code while at the same time restoring the original design. In our view, building to code supports and enhances historic preservation as the long term survivability of the structure depends on the construction being safe, sound and sustainable over time.

STANDARDS FOR RECONSTRUCTION & GUIDELINES
FOR RECONSTRUCTING HISTORIC BUILDINGS

Reconstruction

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.



Standards for Reconstruction

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS

INTRODUCTION

Reconstruction is different from the other treatments in that it is undertaken when there are often no visible historic materials extant or only a foundation remains. Whereas the treatment **Restoration** provides guidance on restoring historic building features, the **Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings** should be followed when it is necessary to recreate a non-surviving building using new material. But, like restoration, reconstruction also involves recreating a historic building which appears as it did at a particular—and at its most significant—time in its history. Because of the potential for historical error in the absence of sound physical evidence, this treatment can be justified only rarely and, thus, is the least frequently undertaken of the four treatments. Reconstructing a historic building should only be considered when there is accurate documentation on which to base it. When only the appearance of the exterior of the building can be documented, it may be appropriate to reconstruct the exterior while designing a very simple, plain interior that does not attempt to appear historic or historically accurate. Signage and interpretative aids should make it clear to visitors that only the exterior of the building is a true reconstruction. Extant historic surface and subsurface materials should also be preserved. Finally, the reconstructed building must be clearly identified as a contemporary recreation.

Research and Document Historical Significance

The guidance for the treatment **Reconstruction** begins with *researching and documenting* the building's historical significance to determine whether its recreation is essential to the public understanding of the property. In some instances, reconstruction may not be necessary if there is a historic building still existing on the site or in a setting that can explain the history of the property. Justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and to ensure that the reconstruction is as accurate as possible. Only one period of significance is generally identified; a building—as it evolved—is rarely recreated. If research does not provide adequate documentation for an accurate reconstruction, other interpretive methods should be considered, such as an explanatory marker.

Investigate Archeological Resources

Investigating archeological resources is the next area of guidance in the treatment **Reconstruction**. The purpose of archeological research is to identify any remaining features of the building, site, and setting that are essential to an accurate recreation and must be reconstructed. Archeological resources that are not essential to the reconstruction should be left in place. The archeological findings, together with archival documentation, should be used to replicate the design, materials, and plan of the historic building.

Identify, Protect, and Preserve Extant Historic Features

Closely aligned with archeological research, recommendations are given for *identifying, protecting, and preserving* extant features of the historic building. It is never appropriate to base a **Reconstruction** upon conjectural designs or on features from other buildings. Any remaining historic materials and features should be retained and incorporated into the reconstruction when feasible. Both the historic and new materials should be documented to assist in interpretation.

Reconstruct Non-Surviving Building and Site

After the research and documentation phases, guidance is given for **Reconstruction** work itself. Exterior and interior features are addressed in general, always emphasizing the need for an accurate depiction (i.e., careful duplication of the appearance of historic materials and features for interpretative purposes). While the use of traditional materials and finishes is always preferred, in some instances substitute materials may be used if they are able to convey the same appearance. Where non-visible features of the building are concerned, such as interior structural systems, contemporary materials and technology may be used. Recreating the features of the building site or setting based on archeological findings should also be an integral part of project work.

Accessibility and Life Safety, Natural Hazards, and Sustainability

Whereas preservation, rehabilitation, and restoration treatments usually necessitate retrofitting to meet code requirements and to

address other issues (including natural hazards and sustainability), in this treatment it is assumed that the **Reconstructed** building will be essentially new construction. Thus, code-required work, treatments to reduce the potential impact of natural hazards, and ensuring that the reconstructed building is as sustainable as possible should be considered during the design phase—when appropriate to the particular Reconstruction project—so as not to negatively impact or detract from the reconstructed appearance of the building, its site, and setting. The fact that the non-surviving building was located in a floodplain or another area especially vulnerable to the impact of natural hazards is crucial to consider when determining whether the building should be reconstructed.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Although specifically developed for the treatment Rehabilitation, the Guidelines can be used to help guide the other treatments.

Reconstruction as a Treatment. When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, **Reconstruction** may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.

OVERVIEW

RECOMMENDED

NOT RECOMMENDED

<p>Researching and documenting the property's historical significance, focusing on documentary and physical evidence which is needed to justify reconstruction of the non-surviving building.</p>	<p>Undertaking a reconstruction based on insufficient research so that, as a result, a historically inaccurate building is created.</p> <p>Reconstructing a building unnecessarily when an existing building adequately reflects or explains the history of the property, the historical event, or has the same associative value.</p> <p>Executing a design for a building that was never constructed.</p>
<p>Investigating archeological resources to identify and evaluate those features and artifacts which are essential to the design and plan of the building.</p>	<p>Failing to identify and evaluate archeological material prior to reconstruction, or destroying extant historic material not relevant to the reconstruction but which should be preserved in place.</p>
<p>Minimizing disturbance of the terrain around buildings or elsewhere on the site, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds.</p>	<p>Using heavy machinery or equipment in areas where it may disturb or damage important landscape features, archeological resources, cultural or religious features, or burial grounds.</p>
<p>Identifying, retaining, and preserving extant historic features of the building, site, and setting, such as remnants of a foundation, chimney, or walkway.</p>	<p>Beginning reconstruction work without first conducting a detailed site investigation to physically substantiate the documentary evidence.</p> <p>Basing a reconstruction on conjectural designs or on features from other historic buildings.</p>

[3] The Cathedral of Saint Michael the Archangel, built in the early 1840s in Sitka, AK, was devastated by fire in 1966. It was reconstructed using measured drawings done in 1961 by the Historic American Buildings Survey (HABS). While the original cathedral was built of logs covered on the exterior with wood siding, its replacement is a fire-resistant structure with concrete and steel walls that replicates the historic building's appearance. Photo: Barek at Wikimedia Commons.



BUILDING EXTERIOR

RECOMMENDED	NOT RECOMMENDED
Reconstructing a non-surviving building to depict the documented historic appearance. Although the use of the original building materials (such as masonry, wood, and architectural metals) is preferable, substitute materials may be used as long as they recreate the historic appearance.	Reconstructing features that cannot be documented historically or for which existing documentation is inadequate. Using substitute materials that do not convey the appearance of the historic building.
Recreating the documented design of exterior features, such as the roof form and its coverings, architectural detailing, windows, entrances and porches, steps and doors, and their historic spatial relationships and proportions.	Omitting a documented exterior feature, or rebuilding a feature but altering its historic design. Using inappropriate designs or materials that do not convey the historic appearance.
Reproducing the appearance of historic paint colors and finishes based on documentary and physical evidence.	Using paint colors that cannot be documented through research and investigation or using other undocumented finishes.
Installing exterior electrical and telephone cables underground or in the least obtrusive location possible, unless they can be documented as having been aboveground historically.	Attaching exterior electrical and telephone cables to the principal elevations of the reconstructed building, unless they can be documented as having been there historically.
Using signage to identify the building as a contemporary recreation.	Failing to explain that the building is a reconstruction, thereby confusing the public's understanding of the property.

JUSTIFICATION FOR THE CHANGE IN ELEVATION TO 7' NAVD

Please note that the raising of the steel structure and the work to install the foundation and set the slab at 7'-0" NAVD, have already occurred and are not part of the new proposed work.

When considering the change in the elevation for the existing house it is useful and relevant to look at the changes in elevation over time. The original house was designed and built in 1956 with an open air ground floor and an enclosed entry room with interior stairs, built on what was then the natural existing grade. In the 1980/1981 renovation the open air ground floor was enclosed within an expanded addition and both the ground floor and the existing steel structure were raised approximately 3'-6" above the existing 3'-6" grade in order to bring the house into compliance with the 7' NGVD flood elevation requirement in effect at the time. At that point, the original building, which had featured an open air ground floor on grade, was altered to include a ground floor that was enclosed and elevated above grade. The raised ground floor was accessed by an exterior set of stairs going from grade leading to the elevated entry door. See photo below.

(Note-In order to avoid confusion, except for the reference above to the old 7'-0" NGVD elevation that was based on the standard reference data at the time the structure was raised in 1980/1981, all elevations numbers throughout the COA application are NAVD, which is the current data standard. For future reference, the old 7'-0" NGVD is equal to approximately 5'-6" NAVD in Delray Beach.)



ELEVATION RAISED IN 1980 TO 7' NGVD

Based on an incorrect elevation certificate in the early stages of the project we thought the existing finish floor elevation was 6' NAVD so we applied for and were granted a variance to retain the 6'-0" elevation for the historic house as well as the new addition. Although the FEMA criteria and the Florida Building Code minimum first finish floor elevation in Coastal Flood Zone AE calls for 6'-0" Base Flood Elevation plus 1'-0", or a total of 7'-0", our reasoning at that time was that the added flood risk at the existing 6'-0" was offset by the fact that we did not want to lift the house and cut the existing steel columns and possibly compromise the entire structure. Subsequently, we learned this information was incorrect. Please see the letters below from Silberstein Architecture and Engineering Plus, the structural engineer, detailing the circumstances whereby it was discovered that the steel at the bottom of the existing steel columns and the steel base plates was badly corroded and needed to be cut out and replaced. When we realized that we were going to have to lift the house in order to repair and replace the corroded sections of the steel columns and base plates as per the structural engineers recommendation, we proceeded to mark the existing finish floor elevation to a fixed point on the site as a reference so we would be sure to reset the house afterwards to the same elevation. In the process of doing this, we realized that the top of the existing multi layered tile covered finish floor was at an elevation of 5'- 9" and the actual plywood sub floor, equivalent to the planned concrete slab, was only 5'- 6".

Due to the fact that our original information was not correct and cutting out the bad steel and replacing with new steel was going to be required anyway, we reconsidered our original plan to use the Variance in order to retain a 6'-0" elevation. A decision had to be made in real time as the house was being raised in the air by the cribbing set up in order support the house and allow access to cut out the corroded steel. The option to cut out the bad steel and re set the elevation of the new concrete slab at the existing 5' 6" sub floor elevation or cutting the steel and raising just 6" to go to 6'-0" were both rejected as these options were not justified from a historic preservation point of view or from a building code point of view for the reasons below.

The Florida Building Code and the City of Delray Beach building code requires that all new construction defined as 'significant improvements' to be 1'-0" above Base Flood Elevation. Since the property is located in Flood Zone AE with a BFE of 6'-0" NAVD, see attached flood zone map, the required top of first finish floor would normally be required to be 7'-0" NAVD. This was noted early on the project history by Patrick Lyon, Plan Review, in the original TAC comments, attached. Steve Tobias, chief building official also guided us initially to the 7' -0" elevation requirement, see copy of e mail attached. However, due to the information we believed to be accurate at the time, we elected in our COA application approved on May 1, 2019 to utilize the 'historic exception' detailed in the Florida Building Code in order to retain the assumed 6'-0" elevation. Our application for a variance to retain the 6'-0" was approved by the HPB as part of the COA granted May 1, 2019. However, our later discovery that the actual existing elevation was 5'- 6" effectively negated the historic basis of the 6'-0" variance. Without any valid justification or a variance to retain the 5' 6" elevation, re setting the new elevation at the old 5' 6" elevation would be contrary to code and would not be supported by the building department. Prior to being advised that the historic structure received an exception to the Florida Building Code, Elizabeth Perez, Plan Review, noted in her comments to our building permit application that the finish floor elevation needed to be at 7'-0" as per FBC and the site being a SFHA/special flood hazard area. See attached permit history notes. The fact that several City officials were initially of the opinion that 7'-0" was the required elevation gave us confidence that we were making the right decision to re set the house at 7'-0". A form board survey and a new 7'-0" elevation certificate were submitted to the building department on July 15, 2020. Due to the rapidly evolving circumstances and a decision that needed to be made in real time, Historic Preservation staff was not informed of the change and it was not approved ahead of time.

An important fact to consider is that Seabreeze Avenue and Vista del Mar Drive are both located in an extremely low lying coastal flood zone in Delray Beach. The elevation at street level adjacent to the property is 1'-0' or less in some places. In fact, the storm drains nearest the 212 Seabreeze property on both the Seabreeze Avenue side and the Vista del Mar S Drive side are the lowest drains on the block and water runs into those drains from all directions during periods of local flooding or intracoastal high water conditions. Unfortunately, the 212 Seabreeze property is located at the lowest spot on two of the lowest streets in Delray Beach so it is critically important to mitigate the risk of flooding on the property by raising the finish first floor to the minimum code compliant elevation of 7'-0". Every existing house in the neighborhood that is

undergoing a major renovation or that is being torn down and replaced by new construction is building at a minimum of 7'-0" so it would not be prudent to build lower than 7'-0" elevation knowing the risks involved. The photos shown are of a nearby renovation on Vista del Mar that is building up the existing ground floor to get to 7'-0" and another new construction house on Thomas St that is building up the existing grade to get to 7'-0". In our case, the only alternative was to raise the steel structure. If we left the steel structure at its existing elevation and simply built up the existing sub floor/slab height from 5'-6" to 7'-0", the ceiling height clearance under the existing steel beam would decrease from 7'-7" to 6'-1" which is not to code. Therefore our only choice was to raise the structure, retaining the existing dimensions and proportions, and to raise the grade accordingly in order to restore the original 'built on grade' appearance.

From a historic preservation point of view the change to 7'-0" is justified and in accordance with the heightened awareness of climate change demonstrated by the **City of Delray Beach Intracoastal Waterway Water Level & Infrastructure Vulnerability Study**, dated October, 2018. Building new improvements at the old 5'-6" elevation would significantly endanger the goals of historic preservation by exposing the house to the increasing risk from rising sea levels and coastal flooding. As per the statement by Silberstein Architects attached, it would not serve the purpose of historic preservation by building at an obsolete and in fact dangerous 5'-6". Retaining the existing 5'-6" elevation would also mean the house would be lower than the FEMA 6' base flood elevation and the house could end up being in violation of FEMA guidelines and uninsurable and uninhabitable in the future.

Under normal conditions the change in the proposed elevation to 7'-0" would have been submitted to the HPB. However, due to the unique and extenuating circumstances that were encountered in real time during March, 2020 at the onset of the pandemic, we were forced to make an instant decision to change the elevation and then justify it retroactively. The contractor, architect, structural engineer and owner agreed this was the only reasonable decision based on the circumstances we encountered.

RJ Heisenbottle recommended in his initial plan review report that the HPB support our decision to raise the elevation to 7'-0", "In this case, since the house was raised significantly by previous owners and since the clearance from the adjoining grade and finish floor to the underside of the perimeter steel beam will remain the same as before, 7'-7" clear from finish floor to underside of perimeter beam, the visual optics and proportions of the original home floating above the ground will remain as it originally was, I would suggest that staff recommend board approval of raising the home to EL. + 7'.

ENGINEERING PLUS

ENGINEERING AND CONSULTING SERVICES

19528 Sedgefield Terrace, Boca Raton, FL 33498

(561) 756 4106 * fax (561) 479 3743 * engplus@cs.com * C.A. # 26538

To: CITY OF DELRAY BEACH BUILDING DEPARTMENT

RE: Existing Steel Column Repair Letter

Project: 212 Seabreeze Ave.
DELRAY BEACH, FL

Engineer: TAYLAN KALKAN, P.E.

Date: June 25, 2020

Dear Sir:

This shall serve as our letter of record regarding to the item listed below

After demolishing the ground floor portion of the existing house structure and upon removing the soil cover around the base of the steel columns down to the pile cap, it was discovered that there was extensive corrosion damage at the bottom of the steel columns and the base plates. In order to ensure the structural integrity of the existing structure, all the corroded steel members were cut out and replaced with new steel members of equal size and strength.

Please do not hesitate to contact me if I may be of further assistance.

Sincerely,



June 25, 2020

Taylan Kalkan, PE

State of Florida Registration # 67349 & C.A. # 26538

SILBERSTEIN ARCHITECTURE

Date: November 11, 2020

Permit #: 19-00185798

Project: Marco Residence, 212 Seabreeze Ave., Delray Beach, FL

To: Steve Tobias, Chief Building Official and Elizabeth Perez, Plan Review
Development Services
100 NW 1st Avenue
Delray Beach, FL 33444

Dear Steve and Elizabeth,

Regarding my e mail of December 10, 2019, whereby my client, Michael and Nina Marco of 212 Seabreeze Avenue, sought your approval for a 6' NAVD design flood elevation. Our position at that time was based on our belief of two main points. First, we thought that the existing historic house was in fact built at 6' elevation. Second, we did not want to cut, weld or in any way damage or disturb the existing 65 year old steel structure which appeared to be in good condition.

Subsequently we learned that both of our original assumptions were incorrect. Upon removal of the dirt and debris around the base of the existing steel columns and pile cap plates, extensive corrosion was evident, see letter of June 25, 2020 from Engineering Plus for details. Once it became clear that the pile cap plates and the corroded base of the steel column would need to be cut out and replaced, the contractor proceeded to cut out the areas where the steel was badly corroded while the house was supported and secured from above. During this time we re checked the elevation and found that the existing sub floor was actually 5'6" rather than the 6' we expected. This is supported by the fact that the house was raised approximately 3'6" at the time of the 1980 renovation in order to comply with the 7' NGVD flood elevation code in effect at that time. The conversion from the NGVD standards in effect in 1980 to the NAVD standard currently in use is about 18". Thus, 7' NGVD in 1980 corresponds to 5'6" NAVD in 2020.

Once the existing house subfloor was determined to be actually 5'6", the client, the General Contractor and I concluded that the only logical decision would be to re establish the 7' elevation, as per the Florida Building Code and City of Delray Beach building code. A decision had to be made in real time as the house was in the process of being lifted in order to allow the repairs to the base of the existing steel columns and pile cap plates.

SILBERSTEIN ARCHITECTURE

As you know, this particular area of Seabreeze Avenue and Vista del Mar South is low, dangerously low in fact, and it has become increasingly prone to flooding from high tides and even routine heavy rainfall combined with problematic storm drains and pump stations, as well as the poor condition of the private sea walls in that area, all documented in the recent City of Delray Beach Intracoastal Waterway Water Level & Infrastructure Vulnerability Study, dated October, 2018. There is also the very real risk that since the current FEMA base flood elevation for the Flood Zone AE is 6', the house would become uninsurable if the existing sub standard 5'6" elevation was retained.

In the interest of historic preservation, once we became aware that the existing corroded steel would need to be cut out and replaced, it would have been negligent to keep the ground floor at the obsolete 5.6" elevation. Doing so would knowingly violate the building code and ignore the prevailing thought and increased awareness within the Architectural and professional scientific community of the dangers presented by rising sea levels and more frequent coastal flooding. We understand that the General Contractor has submitted the form board survey showing the 7' elevation on July 14, 2020. In addition, we have prepared revisions to the permit plans to show the 7' elevation and we understand that the revisions were submitted on November 10, 2020 along with the Elevation Certificate.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jeffrey Silberstein', with a stylized, flowing script.

Jeffrey Silberstein, A.I.A.
Silberstein Architecture, Inc.

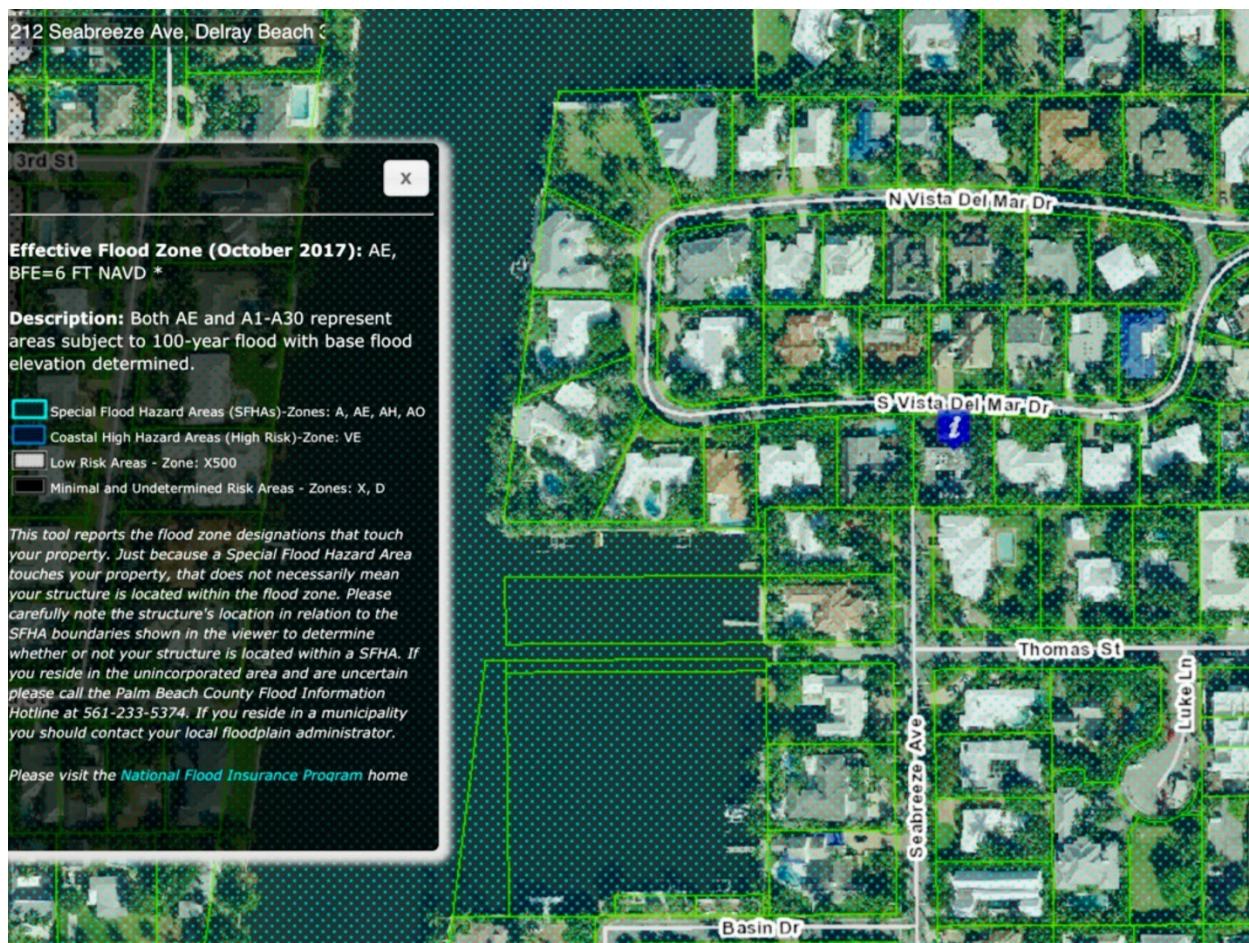


Figure5. 212 Seabreeze Ave location in FloodZone AE 6' NAVD Base FloodElevation

On Wed, Nov 7, 2018 at 4:18 PM Tobias, Steve
<tobias@mydelraybeach.com> wrote:

FEMA guideline for substantial improvement or substantial damage, requires a structure to be elevated when it reaches 50% of the improved value of the structure itself; we use the Palm Beach County Tax Appraisers website to determine the structure's value.

So my thought would be in the AE zone that finished floor would have to be 6' for FEMA plus 1' per the Florida Building Code for a total of 7' NAVD to finished floor.

Hope this helps.

From: Jeffrey Silberstein [<mailto:js@silbersteinarchitect.com>] **Sent:**
Wednesday, November 07, 2018 3:14 PM
To: Tobias, Steve
Subject: Re: question

continuation of same project. Flood elevation or FEMA is at 6.00 zone AE. can we keep the finished floor at 6 feet or do we have to be higher and by how much. The average crown road is at 1.5 feet.

Plan Review

Application Permit Number: 19-00185798
Address: 212 SEABREEZE AVE
Status: In Plan Check

Plan Step	Date to Agency	Reviewer	Status	Comments
FINAL PROCESSING A01			REVIEW/ PENDING	
ELECTRICAL REVIEW B01	11/19/2019	GREGORY S BANKS	APPROVED	
MECHANICAL REVIEW C01	11/17/2019	MIKE JOHNSON	APPROVED	
PLUMBING REVIEW D01	11/18/2019	GENE GARRISON	APPROVED	
ENGINEERING E01	11/12/2019	ELSA GONZALES-SOTO	DISAPPROVED	<p>1. Please contact Engineering Plan Reviewer Clinton Wilat (561-243-7220 Ext.7220) or email gonzales@mydelraybeach.com. A sketch and description along with the completed easement documentation is needed for permit approval.</p> <p>2. Provide site plan page indicating location of city's sewer cleanout and proposed water meter.</p> <p>3. Remove water meter in NE corner.</p> <p>4. Proposed pervious construction which results in a 25% increase of the site impervious area are to provide calculations that demonstrate that on a volumetric basis the post-development runoff from the property shall not exceed the pre-development runoff.</p>
PLAN REVIEW F01	12/3/2019	ELIZABETH PEREZ	DOCUMENT NEEDED	<p>if the first floor is to be used other than storage, parking, or access, the Finish Floor Elevation need to be at Design Flood Elevation of 7 NAVD per FBC 2017 due to the site being at SFHA / special flood hazard area. Structure can be raised an additional 1 foot to max of 8</p>

CITY OF DELRAY BEACH
PLANNING, ZONING AND BUILDING DEPARTMENT



DATE: March 15, 2019

TO: Michelle Hoyland, Principal Planner /
Katherina Paliwoda, Planner

FROM: Patrick Lyons, Plan Review

SUBJECT: TAC (3rd Revision)

ADDRESS: 212 Seabreeze Avenue

-
1. Project must comply with FEMA requirements for Substantial Improvement in A Zone and meet section 322.3.2 of the Florida Building Code.
 2. Plans are not clear, I cannot distinguish what is existing or proposed. Please clarify plans for full review. (This can be complete on the Building Permit review)

Please address comments above

Thank you

Patrick Lyons
Structural Plan Reviewer
City of Delray Beach
(561)243-7200 Ex. 7245



1125 THOMAS ST. RAISE EXISTING GRADE TO MEET 7' CODE



1001 N VISTA DEL MAR RAISE EXISTING FINISH FLOOR TO MEET 7' CODE

LDR Development Standards and Visual Compatibility Standards

Note-The following information is essentially the same as that stated in the Justification Statement of the COA approved on May 1, 2019 as the proposed architectural design of the reconstructed historic house and the new addition remain substantially the same as proposed and approved at that time.

In accordance with the original COA (2018-191) approved May 1, 2019, the rehabilitation and reconstruction of the historic house and the design of the addition complies with **LDR Section 4.5.1(E) Development Standards**, incorporating the **Secretary Of The Interior's Standards For Rehabilitation**, as follows:

Standard 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 proposed work retains the original historic purpose of the house as a residential single family house and adds compatible features such as the air conditioned glassed in ground floor living space and in ground swimming pool, that involve minimal changes to the design characteristics of the historic house. The addition also retains the original historic purpose of the use of the home as a residential beach house and accommodates modern use of the home with a garage, master bedroom and full kitchen, all of which are lacking in the original historic house.

Standard 2- "The historic character of the property shall be retained and preserved. The removal of historic materials or alterations of features and space that characterize a property shall be avoided." The proposed work restores the original design characteristics of the historic house through rehabilitation of the existing steel structure and reconstruction of the exterior facade design using new materials. The Seabreeze rear driveway and the Vista del Mar front will be reestablished. The new addition is connected at the rear, or least public view of the historic house, and is largely hidden from view from the Vista del Mar front.

Standard 3-"Each property shall be recognized as a physical record of it's 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 work is guided by the original architect's design and does not add new features or elements from other buildings.

Standard 4-"Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved."-The non historic additions to the house have been removed. We propose to reconstruct the original historic house as designed by Paul Rudolph in 1955. There are no other added changes over time having any significance that justify preservation.

Standard 5-"Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved."-The characteristic elevated steel column and steel beam structure will be structurally rehabilitated but otherwise preserved as is with respect to its original design. The 2nd floor structure will be reconstructed as originally designed by Paul Rudolph. The characteristic features of the original Paul Rudolph house facade with the 3" grooved wood siding and combinations of fixed glass and 24" louvered panels will be reconstructed using new materials. The new ground floor living space will be reestablished on grade as in the original Paul Rudolph designed house, not raised more than 3' off the ground as in the 1981 alteration. The characteristic 'recessed inside the steel columns glass box' of the original ground floor pedestal will be reestablished and enlarged by enclosing the entire ground floor in glass, reestablishing the original floating 'above the ground' look of the 2nd floor structure.

Standard 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". The existing

missing features shall be substantiated by documentary, physical, or pictorial evidence". The existing steel structure will be repaired and rehabilitated, not replaced. The characteristic features of the historic house such as the 3" grooved wood siding will be restored and replaced, and if damaged beyond restoration, will be replaced with matching materials of the same specification. The existing fixed glass and 24" louvered panels, which do not meet code and are of varying color and quality, will be replaced with clear, impact glass and louvers consistent with the original design of the house with respect to specification, size and proportions. All restoration, repair and reconstruction work will be guided by documented photo's of the house as built in 1956.

Standard 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." The proposed work does not involve any chemical or physical treatments that could damage the structure.

Standard 8-"Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken."-The proposed work does not involve or affect any archeological resources.

Standard 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 architectural style of the original house is one of the earliest examples of the Florida 'Tropical Modernist' style pioneered by Paul Rudolph. The addition is designed by Jeffrey Silberstein, a student of Paul Rudolph's contemporary Ralph Twitchell, and a highly regarded modernist architect. Jeffrey's knowledge and experience in the modernist movement has allowed him to design a compatible and coherent modern addition that does not introduce any design elements characteristic of a different style. The design of the addition and the materials selected are visually compatible with the original historic design and the original historic materials. The addition does not introduce a new architectural style and does not mimic closely the style of the existing building. There is a subtle reference to the materials and character of the existing building. The proposed work on the original house reconstructs the original characteristic features of the white grooved plywood siding and the louvered panels over the clear glass windows. The materials on the addition are sensitively used to be compatible with the historic materials in size, scale and proportion. For example, the grooved siding and louvered features of the original house are reflected in the use of vertical slats and louvers as both a siding and louvered element on the east and west elevation of the addition so that the exterior of the garage and addition are compatible with the historic house. All glass areas of both the historic house and the addition will be the same specification clear impact glass. Both the historic house and the garage and addition will have flat roofs free of any mechanical equipment. The overall effect of the proposed design and the materials for the addition is consistent with protecting the historic integrity of the historic house and the environment.

Standard 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." The proposed addition is connected by a 'bridge' to the original restored historic house. In the event a future owner wanted to remove the addition, the bridge could be easily cut off and the addition demolished. The restored original house could stand on its own with the 2nd floor living room, 2 bedrooms, 2 bathrooms and provision for a galley kitchen intact. The glass enclosed ground floor living space could easily be restored to the open air living space of the original house by simply removing the glass. Neither removing the bridge or the ground floor glass involves any structural or major renovation work.

STANDARDS FOR REHABILITATION & GUIDELINES FOR REHABILITATING HISTORIC BUILDINGS

Rehabilitation

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.



Standards for Rehabilitation

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
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.
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.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
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.
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.

The reconstruction of the historic house and the design of the addition complies with the following **LDR Section 4.5.1(E)(7) Visual Compatibility Standards:**

“New construction and all improvements to both contributing and noncontributing buildings, structures and appurtenances thereto within a designated historic district or on an individually designated property shall be visually compatible. In addition to the Zoning District Regulations, the Historic Preservation Board shall apply the visual compatibility standards provided for in this Section with regard to height, width, mass, scale, façade, openings, rhythm, material, color, texture, roof shape, direction, and other criteria set forth elsewhere in Section 4.5.1. Visual compatibility for minor and major development shall be determined by utilizing criteria contained in (a)-(m) of this section.”

Note: Standards applied for the Minor Development Project (Note: requirements relating to Major development are NOT applicable.

(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 for all major and minor development. For major development, visual compatibility with respect to the height of residential structures, as defined by 4.5.1(E)(2)(a) shall also be determined through application of the Building Height Plane.-The existing 2nd floor structure height will be 18” higher than the existing structure due to the change in the finish floor to 7’ NAVD. However, the original spatial relationship between the elevated house and the ground floor slab on grade will be re established. The proposed addition is slightly higher than the original historic building. We are requesting a Waiver of the Visual Compatibility Standard 4.5.1(E)(8)(a) governing the height of the addition, see Waiver letter, based on the addition being in compliance with the intent of LDR 4.5.1(E)(8)(a) which states that the addition “**shall be visually compatible**” with the historic building. The proposed location of the addition to the rear of and behind the original historic building keeps the addition largely out of the public view. The added height of the addition cannot be readily seen directly head on from the Vista del Mar front, the most public side of the house. Due to the fact that the height of the addition is not readily visible from the Vista del Mar front and the fact that the design of the addition itself is compatible with the historic house, the addition complies with the requirement to be “visually compatible”. The addition height is dictated by the additional vertical space necessary to accommodate modern air conditioning mechanicals, insulation, roof construction and ceiling heights.

b) Front Facade 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 property is individually designed historic so there is no applicable relationship to other structures within a historic district. However, the proposed rehabilitation of the historic house restores the front facade design and proportions of the original Paul Rudolph house. The height, dimensions and proportions of the elevated 2nd floor original house and the living space below reflect the original front facade proportions as designed by Paul Rudolph. The front facade of the proposed addition is not readily visible from any public side view of the property. **See attached Figures 8 through 13 showing the renderings of the façade.**

(c) Proportion of Openings (Windows 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.- The property is individually designed historic so there is no applicable relationship to other structures within a historic district. However, the proposed openings of the restored Paul Rudolph house reestablishes the height and width proportions of the original design with minimal changes using a combination of louvered covered clear glass and fixed clear glass consistent with the original design. The existing placement of the windows and fixed glass is not consistent with the original design since it was changed to accommodate the non historic additions which have now been removed. In addition, the existing glass and louver combinations do not meet current Florida Building Code, lack insulation features and are vulnerable to break in. The overall effect of the proposed window and door opening proportions in the

addition is also compatible with the original historic design. Both the addition and the original house utilize compatible proportions of open fixed clear glass and louvered covered clear glass.

(d) Rhythm of Solids 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 property is individually designed historic so there is no applicable relationship to other structures within a historic district. However, the proposed work on the original house restores the rhythm of solids and voids that were an important part of the original design by utilizing a combination of the original dimension grooved solid siding, fixed clear glass and louvered clear glass. The relationship of solids and voids in the addition, through the use of a combination of solid stucco, fixed glass, louvered glass and louvered siding does not introduce a new architectural style or mimic too closely the original design but is coherent and compatible with the original design..

(e) Rhythm of buildings on streets. 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. The property is an individually designated historic house and is not in an historic district. However, the proposed restored historic house and proposed addition do not change or affect the relationship of the open spaces between the historic house and the adjacent structures. The restored historic house will have the same existing setbacks as the original historic house and the addition will fit into required setbacks as well.

(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.-The property is an individually designated historic house and is not in an historic district. In addition there are no sidewalks on S Vista del Mar. However, the proposed front entrance to the house re establishes the original Vista del Mar front along with the walkway going from Vista del Mar towards the house.

(g) Relationship of Materials, Texture, and Color: The relationship of materials, texture, and color of the facade of a building and/or hardscaping shall be visually compatible with the predominant materials used in the historic buildings and structures within the subject historic district.”- The property is individually designed historic so there is no applicable relationship to other structures within a historic district. However, the proposed work on the original house reconstructs the original characteristic features of the grooved plywood siding with the same original dimensions and specifications. The louvered panels covering the clear glass windows on the 2nd floor structure are the same aluminum material and the same dimensions as what we believe to have been on the original house. The materials on the addition are sensitively used to be compatible with the historic materials in size, scale and proportion. For example, the wood siding and louvered features of the original house are reflected in the use of vertical slats and louvers as both a siding and louvered element on the east and west elevation of the addition so that the exterior of the garage and addition are compatible to the historic house. All glass areas of both the historic house and the addition will be the same specification clear impact glass. Both the historic house and the garage and addition will have flat roofs free of any mechanical equipment. We propose to retain the existing historic Seabreeze driveway entrance.

(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.- The property is individually designed historic so there is no applicable relationship to other structures within a historic district. The proposed reconstruction of the original house flat roof and the flat roof of the addition are not visible at the street or pedestrian level but are never the less consistent with the design of the original house. Since the house is individually designated and not in a historic district, the roof shapes of the surrounding houses are not relevant.

(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.-Although the house is individually designated and is not in a historic district the proposed landscaping is similar to the original theme of locating the heaviest landscaping and trees along the east, west and south boundary and leaving the most public side north side open with the exception of a 4' wall with accompanying hedge or ground cover. The proposed landscape is consistent with the original landscape and is compatible with the surrounding area.

(j) Scale of a Building: The size of a building and the 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. To determine whether the scale of a building is appropriate, the following shall apply for major development only.- The property is individually designed historic so there is no applicable relationship to other structures within a historic district. However, the size, mass, height, location and setback of the original historic building is being retained according to the original historic parameters, except for the change in overall height by 18". The size, mass and location of the addition have been carefully designed to be compatible with the original house and within established setbacks.

(k) 1. Directional expression of 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 property is individually designated and is not in a historic district. However, the proposed front elevation is very close to the original design with minimal changes and the directional expression of the front elevation is unchanged from the original historic house.

(l) Architectural Style: All major and minor development shall consist of only one (1) architectural style per structure or property and not introduce elements definitive of another.-The architectural style of the original house is one of the earliest examples of the 'Tropical Modernist' style pioneered by Paul Rudolph. The addition is designed by Jeffrey Silberstein, a student of Paul Rudolph's contemporary Ralph Twitchell, and a highly regarded modernist architect. Jeffrey's knowledge and experience in the modernist movement has allowed him to design a compatible and coherent modern addition that does not introduce any design elements characteristic of a different style.

(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 least public side of a building and be as inconspicuous as possible. Our proposal takes advantage of the unique characteristics of the lot in that most of the southeast rear corner of the lot is hidden from public view from both the Vista del Mar 'front' and the Seabreeze 'rear'. There is no actual street frontage on the Seabreeze side as that side of the property is 'landlocked' with the exception of the driveway. The addition is largely hidden from view on the Vista del Mar, or most public side of the property, where it is located directly behind the elevated original house and cannot be seen from the direct Vista del Mar street side view and only partially glimpsed from the sides.

2. Additions or accessory structures shall not be located in front of the established front wall plane of a historic building. Our proposed work has no additions or accessory structures in front of the re established front wall plane of the house.

3. Characteristic features of the original building shall not be destroyed or obscured. The proposed work rehabilitates the original characteristic steel structure and reconstructs the characteristic features of the original historic house facade. The characteristic elevation of the steel structure original house above the ground floor living space on grade, the exterior design elements of grooved wood siding, fixed glass and louvered covered glass are preserved in the proposed design and are not obscured or hidden by the addition.

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. The proposed addition is connected by a 'bridge' to the original restored historic house. In the event a future owner wanted to remove the addition, the bridge could be easily cut off and the addition demolished. The original house could stand on its own with the 2nd floor living room, 2 bedrooms, 2 bathrooms and provision of galley kitchen intact. The glass enclosed ground floor living space could easily be restored to the open air living space of the original house by simply removing the glass. Neither removing the bridge or the ground floor glass involves any structural or major renovation work.

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. The architectural style of the original house is one of the earliest examples of the 'Tropical Modernist' style pioneered by Paul Rudolph. The addition is designed by Jeffrey Silberstein, a student of Paul Rudolph's contemporary Ralph Twitchell, a well known and highly regarded modernist. Jeffrey's knowledge and experience in the modernist movement has allowed him to design a compatible and coherent modern addition that does not copy the original Paul Rudolph design nor introduce a totally new or different design theme that conflicts with the original design.

6. Additions shall be secondary and subordinate to the main mass of the historic building and shall not overwhelm the original building. The location, size and mass of addition are subordinate to the original historic house from all public sides. It is directly behind the original historic house and is not visible from the direct head on Vista del Mar view. The elevated height and width of the original house hides the addition behind it. It is mostly hidden from the Seabreeze view by virtue of it being located in the landlocked corner that does not have street side frontage. From the Vista del Mar front and most public view of the property the primary impression will be of the beautifully reconstructed Paul Rudolph design of an early modernist house with the addition being subordinate and secondary.

