

“EXHIBIT B”

**SECRETARY OF THE INTERIOR STANDARDS: EXISTING STRUCTURES**

**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.”**

*Response: We are not changing the property at all, it shall remain a commercial, office use..*

**Standard #2: “The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.”**

*Response: We are proposing peeling off layers of inappropriate elements to harken back to the character of the original structures as evidenced from archival photos.*

**Standard #3: “Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.”**

*Response: We are not attempting to do anything conjectural.*

**Standard #4: “Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.”**

*Response: We agree, we have gone to great lengths to preserve the Main structure, the anchor of the property.*

**Standard #5: “Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize(s) a property shall be preserved.”**

*Response: We agree and are preserving such.*

**Standard #6: “Deteriorated historic features shall be repaired rather than replaced. Where the severity of the 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.”**

*Response: Agreed.*

**Standard #7: “Chemical or physical treatments, such as sandblasting, that causes damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.”**

*Response: Agreed.*

**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.”**

*Response: Not applicable.*

**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 it’s environment.”**

*Response: We shall re-expose the original wood, shiplap siding of the original Main structure, then match that siding up on the new skin of the rear, subordinate, structure – in lieu of the “Hardi Plank” siding that’s exists..*

**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 it’s environment would be unimpaired.”**

*Response: Because we are proposing a modest new roof over the existing flat roof of the rear structure, if it were removed in the future, it would be independent of the original historic fabric and therefore not have any negative impact upon it.*

## **JUSTIFICATION STATEMENT:**

The enclosed submission for COA and Variance involves the ancillary structure located approximately three feet off the west property line at 202 N Swinton Avenue. This justification for the COA and Variance is simple - having obtained permits to re-roof the back structure we removed the existing roof. While removing the roof the supporting walls we became aware of termite damage and water damage to less than 10% (back room) of the structure. The Engineer and Contractor determined that they needed to reframe the back room with new wood to support the roof truss system (per our building permit). The new wood replaced the old wood and the footprint of the building has remained exactly the same. We have boarded up the property with plywood to secure the structure from trespassers. We are seeking approval to replace the back structure in its exact same location. We are also seeking to modify the design of the back structure to remove a door way and replace it with windows, so that the door doesn't lead into a public road way.

July 24, 2024

City of Delray Beach  
100 NW 1st Avenue  
Delray Beach, Florida 33444

Attn.: Michelle Hoyland – Senior Historic Preservation Planner, Development Services

Re: Visual Compatibility Standards

Project: Lakewood, LLC @ 202 N. Swinton Ave., – OSSHAD (Old School Square Historic Arts District)

Mrs. Hoyland:

I hope all is well.

As the Architect-Of-Record for the above referenced Project, please accept this letter addressing Visual Compatibility Standards associated with the COA processing of our Project.

I am focusing on LDR Section 4.5.1(E)(7)(m) Visual Compatibility Standards.

The specific details of the request are centered around the structural reconstruction of three (3) existing exterior wood framed walls of the rear cottage and, to a more minor degree, the reconstruction of the outer wood framed walls of the existing chimney. In both cases, all walls were deemed structural unsound and therefore were required to be rebuilt, to proper structural and modern code standards. All were rebuilt in the exact same position that they originally occupied. Thus, resulting in NO change in exterior aesthetics nor in any deviation from our previously approved “Certified Design Documents”.

### **VISUAL COMPATIBILITY STANDARDS**

#### **“Pursuant to LDR Section 4.5.1(E)(7)(m) – Additions to Individually Designated Properties & Contributing Structures in all Historic Districts”**

*Response: We are compatible because -*

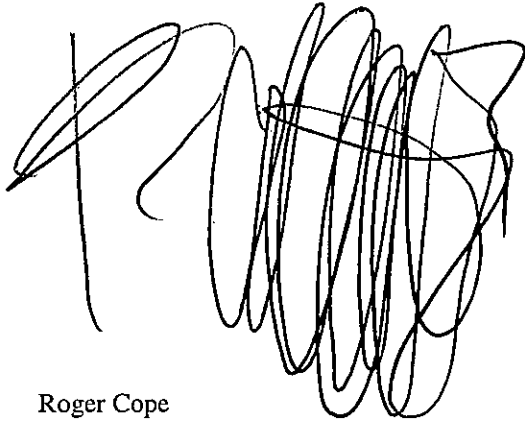
- 1. Our proposed improvements are as subordinate to existing conditions and to both existing structures as possible.*
- 2. We ARE proposing modest “improvements”, the minimum necessary to provide a comfortable and contemporary way of life for future occupants.*
- 3. We are not destroying characteristic features to either of the two (2) original buildings.*
- 4. The basic form and character of the MAIN historic structure will remain intact should our proposed improvements ever be removed.*
- 5. Our proposal does not introduce a new Architectural style nor does it mimic too closely the style of the original building. It closely resembles and compliments it.*
- 6. Our proposal is subordinate to the original building and does not overwhelm it in any way*

Please also see attached “Exhibit “A”, which delineates all ten (10) Secretary of The Interior Standards and how they might be applicable to our Project.

Finally, in my humble opinion, our proposal is an excellent example of renovating and rehabilitating an existing historic structure as outlined in the Secretary of the Interiors Standards for Rehabilitation.

This concludes our visual compatibility standards letter. Please do not hesitate to call should you require anything further. We look forward to being scheduled before the next appropriate HPB Board hearing. Thank you in advance.

Sincerely:

A handwritten signature in black ink, appearing to read 'R. Cope', with a large, dense scribble of overlapping loops and lines extending from the end of the name.

Roger Cope  
Principal  
RWC/jad

Cc Ron Kurzman, Client

## VARIANCE JUSTIFICATION

Standard: That a variance is necessary to maintain the historic character of property and demonstrating that the granting of the variance would not be contrary to the public interest, safety, or welfare.

Response: Variance is necessary to maintain the historic character of the property. We are rehabilitating the historic structure by reframing one room of the structure, which will be reframed in the exact same location that it existed when the property was designated historic.

Standard: That special conditions and circumstances exist, because of the historic setting, location, nature, or character of the land, structure, appurtenance, sign, or building involved, which are not applicable to other lands, structures, appurtenances, signs, or buildings in the same zoning district, which have not been designated as historic sites or a historic district nor listed on the Local Register of Historic Places.

Response: The historic structure is an existing non-conforming structure. It is located within the 10 foot setback from the property line (approximately three feet from the property line). We are proposing to reframe the most western room to match the existing structure.

Standard: That literal interpretation of the provisions of existing ordinances would alter the historic character of the historic district, or historic site to such an extent that it would not be feasible to preserve the historic character of the historic district or historic site.

Response: It is necessary to rebuild the west room of the existing non-compliant historic structure in its current location. Otherwise the historic structure would need to be demolished.

Standard:

That the variance requested will not significantly diminish the historic character of a historic site or of a historic district.

Response: The variance will allow us to rehab the existing structure on the exact same footprint that it has always been on.

The requested variance is necessary to accommodate an appropriate adaptive reuse of a historic building.