

“EXHIBIT A”

**SECRETARY OF THE INTERIOR STANDARDS:**

**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 use of the property: it shall remain a private single-family residence.*

**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: The existing historic structure shall have it's character retained and preserved.*

**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 proposing 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 existing 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: We shall work in a collaborative effort with HPB Staff and the Chief Building Official. Should we experience any examples of deterioration so severe it requires replacement rather than repair, all shall be well documented with City Staff participation.*

**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: Sandblasting or any chemical or any other physical treatment that causes harm to historic materials shall not be allowed on this Project.*

**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: Not applicable.*

**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: Not applicable.*

April 15, 2025

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

Attn.: Michelle Hoyland – Senior Historic Preservation Planner, Development Services (P&Z)

Re: Letter of Justification: COA

Project: The Noel Smith Residence, 49 Palm Square – National Marina Historic District

Mrs. Hoyland:

I hope all is well.

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

I am focusing on LDR Section 4.5.1(7) Visual Compatibility Standards & the Secretary of the Interiors Standards for Rehabilitation.

#### **JUSTIFICATION**

**“Pursuant to LDR Section 4.5.1(7)(a) – Height”**

*Response: Not applicable, we are not proposing any change in height.*

**“Pursuant to LDR Section 4.5.1(7)(b) – Front Façade Proportion”**

*Response: Not applicable, we are not proposing any change to our front façade proportion.*

**“Pursuant to LDR Section 4.5.1(7)(c) – Proportion of Openings (Windows & Doors)”**

*Response: Not applicable, we are not proposing any change to the proportion of openings.*

**“Pursuant to LDR Section 4.5.1(7)(d) – Rhythm of Solids to Voids”**

*Response: Not applicable, we are not proposing any change to the rhythm of solids to voids.*

**“Pursuant to LDR Section 4.5.1 (7)(e) – Rhythm of Building on Streets”**

*Response: Not applicable, we are not proposing any change to the rhythm of the building.*

**“Pursuant to LDR Section 4.5.1(7)(f) – Rhythm of Entrance and/or Porch Projection(s)”**

*Response: Not applicable, we are not proposing any change to the rhythm of the entrance nor porch.*

**“Pursuant to LDR Section 4.5.1(7)(g) – Relationship of Materials, Texture & Color”**

*Response: Applicable – we are proposing to make necessary siding repairs where real wood siding (installed in +-2018) has deteriorated beyond the point of reasonable repair. We are proposing to repair with a man-made siding product “Azek” – which has been approved by HPB Staff and the HPB Board before. For repairs not as new.*

**“Pursuant to LDR Section 4.5.1(7)(h) – Roof Shapes”**

*Response: Not applicable, we are not proposing any change to the roof shapes.*

**“Pursuant to LDR Section 4.5.1(7)(i) – Walls of Continuity”**

*Response: Not applicable, we are not proposing any change to the walls of continuity.*

**“Pursuant to LDR Section 4.5.1(7)(j) – Scale of a Building”**

*Response: Not applicable, we are not proposing any change to the scale of our building.*

**“Pursuant to LDR Section 4.5.1(7)(k) – Directional Expression of Front Elevation”**

*Response: Not applicable, we are not proposing any change to the directional expression of our front elevation.*

**“Pursuant to LDR Section 4.5.1(7)(l) – Architectural Style”**

*Response: Not applicable, we are not proposing any change to the architectural style.*

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

*Response: Not applicable, we are not proposing any additions to the Project.*

*Please see Exhibit “A”, hereby attached, that addresses The Secretary of the Interior Standards.*

Finally, in my humble opinion, our proposal is an excellent example of renovating and rehabilitating an existing historic residence as outlined in the Secretary of the Interiors Standards for Rehabilitation, an electronic copy of which is hereby included in our Flash drive associated with this COA application.

This concludes our justification 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:

Roger Cope  
Principal  
RWC/jad

Cc Noel Smith & Linda Harper-Smith, Clients  
Dana Stearn, General Contractor

