

DEVELOPMENT SERVICES

BUILDING | HISTORIC PRESERVATION | PLANNING & ZONING 100 NW 1st Avenue, Delray Beach, Florida 33444 (561) 243-7040

HISTORIC PRESERVATION BOARD STAFF REPORT				
223 NE 1st Avenue				
Meeting	File No.	Application Type		
August 5, 2020	2020-161	Certificate of Appropriateness (COA)		
	I	REQUEST		
	d façade changes to	a Certificate of Appropriateness (2020-161) request for the o a contributing property located at 223 NE 1st Avenue, Old		
	GE	NERAL DATA		
Agent: Roger Cope, Cope Architects, Inc. Owner: Robin Marino Location: 223 NE 1st Avenue PCN: 12-43-46-16-01-074-0061 Property Size: 0.17 Acres Zoning: OSSHAD (Old School Square Historic Arts District) Historic District: Old School Square Historic District FLUM: OMU (Other Mixed Use) Adjacent Zoning: • OSSHAD (North) • OSSHAD (North) • OSSHAD (North) • OSSHAD (South) • Central Business District (CBD) (East) Existing Land Use: Residence Proposed Land Use: Residence				
BACKGROUND INFORMATION & ITEM DESCRIPTION				
Banker's Row area of the Loc OSSHAD (Old School Square contributing single-family resid	ally and Nationally e Historic Arts Dist dence and 553 squ	NE 1st Avenue between NE 2nd Street & NE 3rd Street within designated Old School Square Historic District and is zoned trict). The 0.17 acre property contains a 1,056 square foot uare foot 1-story guest cottage. The historic 1-story, Frame the guest cottage was constructed in 1949. Both are classified		

Banker's Row began from a replat of the original Block 66 as the individual lots were sold by J.C. Keen, who purchased the block from J.S. Sundy in 1924. Mr. Keen sold the lots to wealthy businessmen in Delray. The structures within the Banker's Row were built in two periods of economic growth and change, before and after the Great Depression. The block (originally established as residential) was characterized by the presence of 2-story Mediterranean Revival residences on the west side of the street, which were built pre-depression along with 1-story Minimal Traditional Cottages (known as the Mackle Cottages) on the east side of the block, built post-depression during World War II. The Mackle cottages are named for the Mackle Brothers who built the 11

Review Dates:	Attachments:
HPB: August 5, 2020	1. Architectural Plans
-	Justification Statements
	3. Photos

homes in the Minimal Traditional style. The structures along the east side of the street significantly contrast the Mediterranean Revival structures on the west side of the street and represent an excellent example of American history and its impact on architecture in the built environment.

The "Banker's Row Plan", developed in the early 1990s, accurately described these structures as relatively small, simple one-story structures, with a dominant gable and simplified façade, absent of traditional detailing with an off-center front door. With the increasing dependence on the automobile, garages were either integrated into the structure or free-standing. The houses were originally very much alike, however, changes were incorporated over the years "as owners adapted their houses to new housing needs."

The subject request is for a 1,167 sq. ft. addition to the rear (east side of the main structure), construction of a new 92 sq. ft. sloped roof over the front porch, and construction of a new wood deck on the rear (east side) of the property. The COA is now before the board.

REVIEW AND ANALYSIS

Pursuant to Land Development Regulation (LDR) Section 2.4.6(H)(5), prior to approval, a finding must be made that any Certificate of Appropriateness which is to be approved is consistent with Historic Preservation purposes pursuant to Objective A-4 of the Land Use Element of the Comprehensive Plan and specifically with provisions of Section 4.5.1, the Delray Beach Historic Preservation Design Guidelines, and the Secretary of the Interior's Standards for Rehabilitation.

Pursuant to Land Development Regulation (LDR) Section 2.4.5(I)(5), <u>Architectural (appearance)</u> <u>elevations</u>, the Site Plan Review and Appearance Board or the Historic Preservation Board, as appropriate, may approve subject to conditions or deny architectural elevations or plans for a change in the exterior color of a building or structure, or for any exterior feature which requires a building permit.

Pursuant to LDR Section 4.3.4(K), Development Standards, properties located within the OSSHAD zoning district shall be developed according to the requirements noted in the chart below.

DEVELOPMENT STANDARDS	REQUIRED	EXISTING	PROPOSED
SETBACKS (MINIMUM) FRONT (EAST)	25'	30'3"-30'4"	25'
SIDE INTERIOR (NORTH)	7.5'	4.9' – 5.1'	7.5' (addition)
SIDE INTERIOR (SOUTH)	7.5'	10.1'- 10.6'	7.5' (addition)
REAR (WEST)	10'	10.1'	no change
HEIGHT	35'(MAXIMUM)	15'	15'

LDR SECTION 4.5.1

HISTORIC PRESERVATION: DESIGNATED DISTRICTS, SITES, AND BUILDINGS

Pursuant to LDR Section 4.5.1(E), <u>Development Standards</u>, all new development or exterior improvements on individually designated historic properties and/or properties located within historic districts shall, comply with the goals, objectives, and policies of the Comprehensive Plan, the Delray Beach Historic Preservation Design Guidelines, the Secretary of the Interior's Standards for Rehabilitation, and the Development Standards of this Section

Pursuant to LDR Section 4.5.1(E)(2)(c)(4) – Minor Development.

The subject application is considered "Minor Development" as it involves "alteration of less than 25 percent of the existing floor area of the building and all appurtenances."

Pursuant to LDR Section 4.5.1(E)(4) – Alterations: in considering proposals for alterations to the exterior of historic buildings and structures and in applying development and preservation standards, the documented, original design of the building may be considered, among other factors. The existing structure, and its remaining original form, has been considered with respect to the proposed addition and site improvements.

Pursuant to LDR Section 4.5.1(E)(5) - Standards and Guidelines: a historic site, building, structure, improvement, or appurtenance within a historic district shall only be altered, restored, preserved, repaired, relocated, demolished, or otherwise changed in accordance with the Secretary of the Interior's Standards for Rehabilitation, and the Delray Beach Historic Preservation Design Guidelines, as amended from time to time.

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.

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.

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.

Standard 4

Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Standard 5

Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

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.

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.

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.

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.

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.

Standard 1, 2, 3, 5, 9, & 10 are applicable. The proposed 1,167 sq. ft. addition on the east side (rear) of the structure can be considered to be secondary & subordinate to the massing of the main residence. The proposal includes Hardiboard siding on the new addition with a dark gray asphalt dimensional shingle roof. The existing wood siding on the original structure will be retained and new bronze aluminum framed windows and doors are proposed for the entire structure. The entire structure will be painted white. There is concern with respect to the finish and design of the proposed windows as they incorporate window profiles that are not visually compatible with the existing window pattern of the historic structure nor the structures within the district, and the window frames are proposed to be bronze aluminum where white framed windows exist.

The proposal also includes a new front porch addition that will project from the front of the structure on the west side of the property. Currently, there is a recessed porch on the front elevation, which is proposed to remain. The proposed front porch addition includes a shingle roof in an opposing gable that will extend approximately 5'4" from the front façade. There is concern that the proposed front porch modifies the front elevation, and is not a minimal change to the defining characteristics of the building and its site and environment (Standard 1). The simple design of all of the structures along Banker's Row represent a time of recovery in American history following the Great Depression and during World War II. The understated and simplistic style of the front facade will be altered by the proposed porch addition, giving the structure a more prominent appearance that is not original to the structure and will represent an alteration of features and spaces that characterize the property (Standard 2). Additionally, the proposed porch addition is a change that creates a false sense of historical development and does not allow for the property to be recognized as a physical record of its time (Standard 3). The existing modestly designed, front porch is a distinctive feature that characterizes the simplicity of the Minimal Traditional architectural style as it is recessed under the existing roof line. The proposed porch addition will obscure this distinctive feature from the front facade (Standard 5). The addition of a new projecting, front facing gable porch design will not represent a protection of the historic integrity of the property as it is an exterior alteration that is not compatible with the architectural features that exist on the front elevation (Standard 9). Finally, the new addition of the front porch is a more permanent feature with its fixed columns and shingle roof, and while it could be removed in the future without affecting the essential form and integrity of the historic property, the proposed porch alters the historic integrity of the structure and can be considered a conjectural feature not original to the original design of the building. (Standard 10).

It is also noted that the proposal includes removal of the kitchen from the original structure and placing it in the new addition. This improvement does not meet the intent of Standard 10, as should the addition be removed in the future, the original structure would no longer contain a kitchen. This could have a negative effect on the integrity of the original structure as the kitchen would be eliminated.

A wooden deck is proposed on the northeast side of the new rear addition. A 4' wide Chicago brick paver path is proposed on the west side (front) of the property. Also, a new 6' wood privacy fence will be installed to match the existing fence.

With the exception of the front porch addition, the proposed improvements represent an appropriate modification to the historic structure and will contribute to the historic integrity of the Banker's Row area and the Old School Square Historic District.

Pursuant to LDR Section 4.5.1(E)(7) - <u>Visual Compatibility Standards</u>: 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 as referenced in Section 4.5.1(E)(2) shall be determined by utilizing criteria contained in (a)-(m) below.

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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:
 - a. For buildings wider than sixty percent (60%) of the lot width, a portion of the front façade must be setback a minimum of seven (7) additional feet from the front setback line:
 - b. For buildings deeper than fifty percent (50%) of the lot depth, a portion of each side façade, which is greater than one story high, must be setback a minimum of five (5) additional feet from the side setback line:
- k. 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.
- I. 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 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.
- 2. Additions or accessory structures shall not be located in front of the established front wall plane of a historic building.
- 3. Characteristic features of the original building shall not be destroyed or obscured.
- 4. Additions shall be designed and constructed so that the basic form and character of the historic building will remain intact if the addition is ever removed.
- 5. Additions shall not introduce a new architectural style, mimic too closely the style of the existing building nor replicate the original design but shall be coherent in design with the existing building.
- 6. Additions shall be secondary and subordinate to the main mass of the historic building and shall not overwhelm the original building.

The proposed 1,167 sq. ft. addition on the east side (rear) of the structure can be considered to be secondary & subordinate to the massing of the main residence. The proposal includes Hardiboard siding on the new addition with a dark gray asphalt dimensional shingle roof. The existing wood siding on the original structure will be retained and new bronze, aluminum framed, windows and doors are proposed for the entire structure. The entire structure will be painted white. There is concern with respect to the finish and design of the proposed windows as they incorporate window profiles that are not visually compatible with the existing window pattern of the historic structure nor the structures within the district, and the window frames are proposed to be bronze aluminum where white framed windows exist.

The proposal also includes a new front porch extension where an existing recessed front porch exists. The new front porch includes a new opposing gable, shingle roof structure on the front elevation (west side).

WINDOWS:

The proposal includes new bronze, aluminum framed windows for the entire structure, where white framed windows exist. The replacement windows on the original structure will incorporate a 6-over-6 and 9-over-9 dimensional muntin pattern to match existing; however, Clerestory style windows are proposed on the south elevation of the rear addition and cottage.

Pursuant to "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings" (Guidelines):

WINDOWS		
RECOMMENDED	NOT RECOMMENDED	
<i>Identifying, retaining, and preserving</i> windows and their func- tional and decorative features that are important to the overall character of the building. The window material and how the window operates (e.g., double hung, casement, awning, or hopper) are significant, as are its components (including sash, muntins, ogee lugs, glazing, pane configuration, sills, mullions, casings, or brick molds) and related features, such as shutters.	Removing or substantially changing windows or window features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Changing the appearance of windows that contribute to the historic character of the building by replacing materials, finishes, or colors which noticeably change the sash, depth of the reveal, and muntin configurations; the reflectivity and color of the glazing; or the appearance of the frame. Obscuring historic wood window trim with metal or other material. Replacing windows solely because of peeling paint, broken glass, stuck sash, or high air infiltration. These conditions, in themselves, do not indicate that windows are beyond repair.	

The Guidelines do "not recommend removing or substantially changing windows or window features which are important in defining the overall historic character of the building so that, as a result, the character is diminished." The Guidelines also do "not recommend changing the appearance of windows that contribute to the historic character of the building by replacing materials, finishes, or colors which noticeable change the sash, depth of the reveal, and muntin configurations; the reflectivity and color of the glazing; or the appearance of the frame." (pg. 102).

The Delray Beach Historic Preservation Design Guidelines note the following with respect to the Windows:

"Windows are a preeminent character-defining feature of a building. Their placement, design and materials serve to articulate and give definition to the design-specific styles and periods of time. For example, in Bungalows, there are usually multiple panes in the upper window sash and in Mediterranean Revival designs, windows are frequently arched (page 43)."

"New windows in additions or exposed party walls should be compatible with the overall design, but not necessarily duplicate the fenestration pattern and detailing of a character-defining elevation" (page 44).

A recommended approach to new construction includes "Window types and patterns, as well as their general placement, should be similar to surrounding buildings" (page 50).

Bronze framed windows are not characteristic of this structure nor to the other Mackle Cottages within Banker's Row. The existing windows of all of the Mackle Cottages within Banker's Row were designed with have white framed windows. To date, all of the Banker's Row structures have white framed windows, whether wood or aluminum. Changing the appearance of the frame to utilize dark frames such as bronze frames is not a recommended approach. An added condition of approval is that the window frames be white, aluminum.

Clerestory windows are a modern style window, which was not a style that was characteristic of the Minimal Traditional style nor the existing Mackle Cottages within Banker's Row. Further, the existing structure does not include Clerestory style window. It is noted that the design and/or reconfiguration of interior spaces should not reflect on exterior changes such as window profiles. An added condition of approval is that the Clerestory windows be replaced with windows that are visually compatible with the existing 6-over-6 window style.

The existing windows contain clear, non-reflective glass. The proposal notes the installation of Low-e glass, which has a light green tint and sometimes a reflectivity. As the Guidelines above note, changing the reflectivity and color of the glazing is not recommended. An added condition of approval is that all windows have clear glass with no tint or reflectivity.

FRONT PORCH:

According to the Banker's Row Plan, the cottages were designed by architect Harold Steward built and sold by the same developer, The Mackle Brothers. These homes were built alike using the same "stock model" building components. However, care was taken to make each one slightly different from its neighbors. There were also additional personalization options for owners of the structures for modernization needs over the years.

The Banker's Row vernacular structures were all constructed with relatively the same floor plan; however, each has a slightly different facade and architectural detailing on the front elevations, which contribute to the historic district. These slight variations and slightly modified designs collectively make the Banker's Row Cottages significant as all 11 structures on the east side of the block are part of a collection of historic buildings that represent American history in the built environment.

The subject property is the <u>only structure</u> within the block that has a recessed front porch without a front facing gable roof. This existing design represents the slight variation in style between the front elevation of the Mackle Cottage structures. While there are 2 other structures that have recessed porches, those structures have front facing gable roof facades. The proposed porch design may be visually compatible with the relationship of entrances and porch projections of existing buildings and structures within the Banker's Row block, but it represents a redesign of the subject structure's front elevation that modifies the historic integrity of the structure causing a loss of the character defining differentiation. Further, the proposal does not meet the requirements of LDR Section(E)(7)(m) in that the addition is not proposed to be in the least public side of the building nor is it designed to be as inconspicuous as possible. It is proposed in front of the established front wall plane of the historic building, which will affect the characteristic features of the original building and will overwhelm the original design of the historic structure.

Pursuant to "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings" (Guidelines):

ENTRANCES AND PORCHES

RECOMMENDED	NOT RECOMMENDED
<i>Identifying, retaining, and preserving</i> entrances and porches and their functional and decorative features that are important in defining the overall historic character of the building. The materials themselves (including masonry, wood, and metal) are significant, as are their features, such as doors, transoms, pilasters, columns, balustrades, stairs, roofs, and projecting canopies.	Removing or substantially changing entrances and porches which are important in defining the overall historic character of the build- ing so that, as a result, the character is diminished. Cutting new entrances on a primary façade.
	Altering utilitarian or service entrances so they compete visually with the historic primary entrance; increasing their size so that they appear significantly more important; or adding decorative details that cannot be documented to the building or are incompatible with the building's historic character.

The Guidelines do "not recommend removing or substantially changing entrances and porches which are important in defining the overall historic character of the building so that, as a result, the character is diminished" (pg. 110).

As the subject structure is the only structure within the Banker's Row block that has a recessed porch without a front facing gable roof, modification of this design will have a negative effect on the historic character of the building.

Therefore, it cannot be considered an appropriate alteration that meets the requirements of the LDRs. An added condition of approval is that the proposed front porch addition be deleted from the request or redesigned to meet the requirements of the LDRs, the Secretary of the Interiors Standards for Rehabilitation, and the Delray Beach Design Guidelines.

Provided the conditions of approval are addressed, the improvements can represent an appropriate modification to the historic structure and will contribute to the historic integrity of the Banker's Row area and the Old School Square Historic District.

Pursuant to the Historic Preservation Element, Objective A-4, the redevelopment of land and buildings shall provide for the preservation of historic resources. The objective shall be met through continued adherence to the City's Historic Preservation Ordinance and, where applicable, to architectural design guidelines through the following policies:

Historic Preservation Element 1.4 Property shall be developed or redeveloped, in a manner so that the future use, intensity and density are appropriate in terms of soil, topographic, and other applicable physical considerations; encourage affordable goods and services; are complementary to and compatible with adjacent land uses; and fulfill remaining land use needs.

The development proposal involves an addition and maintenance of the existing contributing structure. There are no concerns with respect to soil, topographic or other physical considerations. With respect to the adjacent land uses, the property is in an area surrounded by a mix of residential and commercial uses. The proposal can be considered consistent with the subject Objective.

Historic Preservation Element 1.4.1 Prior to approval or recommending approval of any land use or development application for property located within a historic district or designated as a historic site, the Historic Preservation Board must make a finding that the requested action is consistent with the provisions of Section 4.5.1 of the Land Development Regulations relating to historic sites and districts and the "Delray Beach Design Guidelines".

The structure is contributing to the Old School Square Historic District located on Bankers Row. Provided the conditions of approval are addressed, the proposal can be found to be consistent with the requirements of the Comprehensive Plan and the request can be considered to be consistent with the provisions of LDR Section 4.5.1 relating to historic sites and districts as well as the "Delray Beach Historic Preservation Design Guidelines".

The proposal represents an addition and renovation of a contributing structure involving a new 1,167 sq. ft. addition to the rear of the existing residence, installation of a wooden deck to the rear of the addition, and construction of a new front porch addition. This property is significant to the Old School Square Historic District given the fact that it is a contributing structure within the district. Provided the conditions of approval are addressed, the proposal can be deemed to be consistent with the subject Objective and Policies.

ALTERNATIVE ACTIONS

Move to continue with direction

Approve Certificate of Appropriateness (2020-161), for the property located at **223 NE 1st Avenue, Old School Square Historic District,** by finding that the request and approval thereof is consistent with the Comprehensive Plan and meets the criteria set forth in the Land Development Regulations.

Approve Certificate of Appropriateness (2020-161), for the property located at **223 NE 1st Avenue, Old School Square Historic District** by finding that the request and approval thereof is consistent with the Comprehensive Plan and meets the criteria set forth in the Land Development Regulations, subject to the following conditions:

1. That the proposed Clerestory windows be replaced with windows that are visually compatible with the existing 6-over-6 window style;

- 2. That all window frames be white, aluminum;
- 3. That all windows have clear glass with no tint or reflectivity;
- 4. That the proposed front porch addition be deleted from the request or redesigned to meet the requirements of the LDRs, the Secretary of the Interiors Standards for Rehabilitation, and the Delray Beach Design Guidelines.

Site Plan Technical Item

- That the existing floor square footage total on Sheets A3.1 and A4.1 be revised to reflect the correct calculations.
- Provide an existing site plan layout.
- Remove interior demolition Sheet A3.0 from plan sets
- Setbacks on proposed project chart should reflect the same measurements shown on site plan (Sheet A2.0)

Deny Certificate of Appropriateness (2020-161), for the property located at **223 NE 1st Avenue, Old School Square Historic District,** by finding that the request is inconsistent with the Comprehensive Plan and does not meet the criteria set forth in the Land Development Regulations.

PUBLIC AND COURTESY NOTICES			
\underline{X} Courtesy Notices are not applicable to this request	\underline{X} Public Notices are not required for this request.		
	\underline{X} Agenda was posted on (7/29/20), 5 working days prior to meeting.		