

MIAMI BEACH

PLANNING DEPARTMENT

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August 29, 2022

Members of the Florida Building Commission & Accessibility Advisory Council
c/o Chip Sellers, Operations Consultant
Florida Department of Business and Professional Regulation
2601 Blair Stone Road
Tallahassee, Florida 32399

RE: 411 and 419 Michigan Avenue and 944 5 Street, Miami Beach, Florida

Dear Mr. Sellers and Members of the Commission and Council:

I am writing in reference to two historic structures located at the above-referenced property, and the request for an accessibility waiver.

The property located collectively at 411 Michigan Avenue, Miami Beach contains two contributing historic structures, built one year apart. In 1933, an approximately 508 square-foot single-story structure located at the rear alley was built as a garage. In 1934, an approximately 681 square-foot two-story residence was built in front of the garage in the middle of the parcel. In 1954, the garage was converted into a bedroom and bathroom.

In 1912, brothers James and John Lummus and others purchased 580 acres of land between what is today South Pointe Drive and 5th Street in Miami Beach, and platted the area as the Ocean Beach Subdivision, which was the first plat recorded in what would become the City of Miami Beach. They then platted Ocean Beach Additions 1 through 4 between 1913 and 1914. The property is located in the Ocean Beach Historic District, which was designated as a historic district in 1995 to preserve the small-scale character of the modest resort community by the sea at the early years of the City's history. The architecture in the area is reflective of generally modest Art Deco and Mediterranean Revival Hotels, as well as small apartment homes.

The two structures, each with their simple Mediterranean Revival styling, retain a great degree of historic and architectural integrity and are representative of the rich diversity of architectural styles that have evolved within the City's Historic Districts. The Historic Preservation Board recently approved the development of a five-story Class A office building with ground floor commercial space to be located at the property and built on an existing foundation for a failed hotel project. The Historic Preservation Board also required that the existing historic structures remain and that their configuration be maintained, although allowing the preservation and relocation of the historic residence from the middle of the parcel to a more prominent position fronting Michigan Avenue, with the one-story building close behind. Notably, the structures will be elevated to BFE + 1' to best address sea-level rise and resiliency and to ensure their longevity in their new locations. This creates a significant height difference from the existing street and sidewalk to the structures. The structures will be adaptively reused as commercial space, such as a café, with the one-story building, with its roof removed, used as a unique dining area. The maintenance and configuration of these structures is essential to the future understanding of the development of architecture in Miami Beach while ensuring preservation of this historic area.

The subject structures qualify collectively as historic buildings under the Federal ADA regulations, the ADA Accessibility Guidelines (ADAAG) and Chapter 11 of the Florida Building Code. The requested waiver pertaining to the vertical accessibility to each structure is critical to the restoration plan for the building complex. In order to accommodate vertical accessibility, especially to the raised structures, substantial modifications to the historic exteriors would be required, including extensive ramps and/or lifts, all of which would compromise the historic integrity of the Mediterranean Revival design. Further confining placement of the ramps is the existing foundation for the office building, which encompasses the northern two-thirds of the property. Ramps would therefore impede both pedestrian and vehicular access to the entire project.

Based on these constraints and the impacts to the historic structures, it is technically infeasible to comply with the applicable ADA requirements. Nevertheless, the architectural plans include accessible areas to all areas of the new office building and its ground floor commercial areas. This includes ramps that provide access from the lower street and sidewalk.

The Planning Department, on behalf of the Miami Beach Historic Preservation Board, strongly supports the subject waiver request. If you have any questions relative to the historic significance of the existing structures, or you need additional information, please do not hesitate to contact me.

Sincerely,



Debbie Tackett
Historic Preservation & Architecture Officer