



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240



September 25, 2019



PROPERTY: **Miami Woman's Club 1737 North Bayshore Drive, Miami, FL**
PROJECT NUMBER: **35784**

Dear [REDACTED]

I have concluded my review of your appeal of the November 2, 2018 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the *Historic Preservation Certification Application; Part 2 – Description of Rehabilitation* application for the property cited above. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 C.F.R. part 67) governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank [REDACTED] for meeting with me on April 10, 2019, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the additional information submitted as part of your appeal, and subsequently submitted by [REDACTED], I have determined that the proposed rehabilitation of the Miami Woman's Club is not consistent with the historic character of the property and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards). Accordingly, the denial issued in TPS's November 2, 2018 Decision, is hereby affirmed.

The Miami Woman's Club is a four-story, Spanish Renaissance Revival Style building designed by local architect [REDACTED]. Constructed in 1925-26, it is located on a plot of land facing Biscayne Bay to the east, with Margaret Pace Park on the north, and more recently constructed, significantly taller buildings to the south and across Bayshore Drive to the west. The building is a simple rectangular mass, originally with elaborate sheet metal ornament cladding three facades from the third floor belt course up to the parapet. The floors vary in height depending on their interior function, with the ballroom on the top floor being the tallest. In 1951, exterior architectural details consisting of metal cresting at the roofline and pilasters and ornamentation at the fourth floor level were removed due to deterioration from the salt air environment. The building was listed individually in the National Register of Historic Places in 1974 for its significance in architecture, art, education, literature, music, and social history.

In its denial decision, TPS noted that “*three different proposals for a rooftop addition have been submitted for review.*” Although changes to the design were made to lessen its impact, the massiveness of the addition and its imposing presence remain the principal reason for the denial. As TPS noted, the U-shape of the building and the resulting narrow roof areas make it impossible to set back any rooftop addition far enough to minimize its visibility and thus comply with the Standards. TPS also identified the large raised deck on the east side of the building and landscape alterations as issues contributing to its denial.

In the appeal, you presented further revised designs for the rooftop addition, and you proposed significant changes to the proposed raised deck and to the landscape design.

With regard to the large raised deck, which hid the historic steps up to the entrance on the Biscayne Bay side of the building, you have eliminated it from the revised design, replacing it with a lawn area and retaining the original stepped entrance. Accordingly, the deck has been eliminated as an issue contributing to the denial.

With regard to the landscaping changes, although the west half of the site will be covered with parking, the elimination of the raised deck on the Biscayne Bay side of the property will restore its historically open character. I note that, prior to this rehabilitation, the site was substantially covered by parking lots. The building had been encircled with paving for decades. I have determined that limiting parking to the west end of the site, restoring the return loop access to the porte cochere on the south side of the building, and restoring the open landscape on the bay side will reasonably replicate the historic character of the overall site. Accordingly, I find that the revised landscape design is compliant with the Standards and have eliminated it as an issue contributing to the denial.

In my review, I acknowledge that restoring the original sheet metal ornamentation on the fourth floor and parapet is a welcome enhancement to the project, and it will help hide some of the proposed rooftop addition. I also note that the incremental changes to the rooftop addition made in the appeal presentation will slightly reduce its mass and slightly improve its appearance. However, despite these attempts to reduce its impact, I find that the rooftop addition remains a large and prominent new feature that is incompatible with the historic massing, size, scale, and architectural features of the property, and which substantially compromises its overall historic character. And, because the property can be seen from far distances to the east and north, and to a lesser degree from the west, the rooftop addition will also be a visibly prominent new feature in the surrounding environment. Accordingly, I concur with TPS that the proposed rooftop addition contravenes Standards 2 and 9. Standard 2 states, “*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 9 states, “*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.*”

Consequently, because of the scale, massing, and prominence of the rooftop addition, I find that the overall impact of the proposed rehabilitation of the Miami Woman’s Club will significantly compromise the historic character of the property, and it thus fails to meet the Standards. I hereby affirm the decision by TPS to deny certification.

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the November 2, 2018 Decision that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA, FAPT
Chief Appeals Officer
Cultural Resources

cc: SHPO-FL
IRS

