

Greg Walters

From: Elaine Reed <ereed@napleshistoricalsociety.org>
Sent: Thursday, February 21, 2019 12:13 PM
To: 'Michelle McLeod'
Subject: Naples Historic District REHABILITATION
Attachments: District - Council Videos Research.pdf; SHPO Approval 20Feb2019.pdf; 6610th Ave S SHPO-20Feb2019.pdf; SHPO approval MAIN HOUSE.pdf; Six Steps to Get You There! REV.pdf

Importance: High

Michelle:

THANK YOU for taking time to meet with me yesterday for an update on the Naples Historic District Initiative. I admit that my frustration is beginning to show; the state-approved process is right under our nose, but there are needless roadblocks. I appreciate that I could speak candidly with you.

You'll recall that the Society first introduced the Naples Historic District Initiative on April 16, 2016 to City Council. As you well know, I've been in front of Council, the PAB, and DRB countless times advocating for this project, one way or another. Attached is a list of all of the times I've been to City Hall over the years.

The aggregate subject-matter, *Historic House Rehabilitation*, appears complicated, but it's NOT.

Of course, the National Flood Insurance Program (NFIP) wants every structure to be higher. But, they have an agreement with the State Historic Preservation Office (SHPO) that National Register-recognized structures and Districts can be spared elevation requirements **if** SHPO determines the proposed rehabilitation plans will maintain historic character. The arrangement is validated in official SHPO approval letters...see the three SHPO Approval letters attached—*notice the reference to NFIP!* Furthermore, Florida Building Code Chapter 12, also states in black and white that historic houses are exempt from the 50% Rule.

The Society established *Six Steps to Get You There!*, which reflects this uncomplicated process, and it is easy to use. Please see the attached *Six Steps* document; it has been updated to include a requirement for an Elevation Certificate. Sadly, the Floodplain Coordinator continues to push homeowners to get appraisals (for the 50% Rule) and recommends that homeowners endure a local process whereby the Floodplain Coordinator render judgment on the proposed plans for rehabilitation.

With great respect to you and the City of Naples, the Floodplain Coordinator does not have the credentials nor authority to review rehabilitation plans to ensure historic character remains, interior or exterior. (Remember that when no Federal dollars are used, the interior can be whatever the homeowner wants!) Design reviews are conducted by the State of Florida OR a municipality that is a Certified Local Government, the latter of which trains the DRB to learn how to render such judgment. As you know, we abandoned that idea and decided to rely on the state because it's easier this way.

Finally, Jason Aldridge, the Compliance Supervisor at SHPO, said his office would review ANY historic structure, regardless of the extent of the design proposal (i.e. under or above 50% of the construction value). That's a bonus for the City of Naples because then ALL decisions for any size modification would come from SHPO, and NFIP respects SHPO's judgment.

Michelle, you'll recall my recap of the Community Rating System (CRS) issues from long ago: Naples' Building Official (pre 2005 hurricanes) understood historic preservation and how to maintain character, BUT he was not a State of

Florida-sanctioned entity. In other words, this Building Official was making exclusive judgments that did not reflect a CLG-approved design review board or the State's opinion. THAT IS WHY Naples had trouble in the mid-2000s.

Going to the State for design review solves this issue. It's FREE, it's not complicated, and the architects and contractors I've spoken with prefer this route.

Everything I've stated here is a repeat of many other presentations, so forgive my redundancy. I even created a flow chart to document the process with Robin Singer's input. We seem to be stuck, and we need not be stuck. It's not a City Council vote; it's an administrative issue.

My Board of Directors and I are eager for your comments and any help. Thank you, in advance, for your time.

Regards,

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