

From: Elaine Reed <ereed@napleshistoricalsociety.org>
Sent: Friday, November 8, 2019 10:29 AM
To: 'Charles Chapman' <CChapman@naplesgov.com>
Cc: 'Craig Mole' <CMole@naplesgov.com>; Denny Glass <dennyglass@me.com>
Subject: FPMO - Society Feedback

Charles:

Good morning! Thank you, again, for sharing the proposed ordinance revisions with the Society. This is truly collaborative.

Overall, the revised FPMO is very good and incorporates the many decisions that resulted from our discussion on October 25th. I believe Jon Kukk has or soon will reply directly to you. After reasonable review, I submit the following thoughts for your consideration, in no particular order:

- (1) At the October 25th meeting, we discussed streamlining requests for non-conformities, but after further reflection, we think that continuing the current process of non-conformity requests by going to City Council is reasonable; it certainly helps with giving room to “the neighbors” should they want to speak up about a proposed encroachment, etc. I believe Robin spoke about that issue, and we agree with her. That said, we’ll follow your lead and preference on this topic.
- (2) Will you clarify if this set of revisions will pertain to residential, commercial, and/or multi-family historic structures (historic, as determined by SHPO)? This could be of value for certain buildings, including The Dock Restaurant, which was already granted an exception to the floodplain regulation rules.
- (3) Will you consider adding language that reflects recognized structures in the Naples Historic District and those outside of the District that may be deemed eligible for listing in the National Register? You’ll recall we discussed the 62 existing historic structures in the District and a possible 1,570 additional residential structures in the City of Naples, but outside of the District. Which houses outside of the District, if any, would be deemed eligible is unknown at this juncture.
- (4) With regard to the new Section 16-116—Historic Buildings, will you consider adding language to reflect the “like-for-like” text amendment we discussed a while back? Like-for-like exterior rehabilitative alterations would be exempt from SHPO review. Perhaps something as follows: Like-for-like rehabilitative alternations on the exterior to replace or restore finishes, as well as for the hardening of doors and windows. This, if memory serves me, was considered reasonable by Steve Martin.
- (5) A few language suggestions in the new Section: 16-116—Historic Buildings.
 - (a) Purpose. Rather than “...preservation and protection” we prefer “preservation and rehabilitation of historic structures.” *This is because the word ‘protect’ carries significant meaning with preservationists with ensuring houses are not torn down, and that we cannot mandate, unfortunately.*

- (b) Ibid. "...to ensure preservation" is better stated as "to promote the preservation and rehabilitation of" *See above explanation.*
- (c) Exception Criteria (1). Rather than "...will maintain its historic designation" should be "...will maintain historic character." That language is ubiquitous in the State Historic Preservation Office.
- (d) Submittal Requirements. Is it reasonable to include an expectation for a floodplain elevation certificate in this section? *This gives due notice, so that there are no surprises later in the process, very user-friendly.*

We sincerely appreciate being a part of this process prior to going to the PAB and/or City Council. Please call me to discuss anything presented. We look forward to finalizing this ordinance and the meaningful big-picture opportunity associated with it. Many thanks to you and your team.

Regards,

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