

March 13, 2023

**Via Email**

Honorable Mayor and Commissioners  
City of Coral Gables Commission  
405 Biltmore Way  
Coral Gables, FL 33134

**Re: Letter Requesting Dismissal of Appeal of City of Coral Gables Historic Preservation Board's Determination / Application No. 23-5190 / File ID 2022-014 / 110 Phoenetia Avenue**

Dear Honorable Mayor and Commissioners:

Our firm represents Century Crystal Group, LLC (the "**Owner**"), the owner of the property located at 110 Phoenetia Avenue, Coral Gables, Florida (the "**Property**"). The Owner respectfully requests that the City of Coral Gables (the "**City**") Commission (the "**Commission**") dismiss the appeal of the Historic Preservation Board's (the "**Board**") determination that the Property does not meet the minimum eligibility criteria for designation as a local historic landmark (the "**Determination**"). As explained below, the Appeal should be dismissed because the Appellant does not have standing and allowing the Appeal to proceed would violate the essential requirements of law.

**INTRODUCTION**

On August 9, 2021, pursuant to Section 8-107(G) of the City Code, prior to the Owner purchasing the Property, the City's Historic Preservation Officer issued a finding that the Property did not meet the minimum eligibility criteria for designation as a local historic landmark. A copy of the August 9, 2021 Letter is attached as **Exhibit 1**.

Approximately one year later, on August 18, 2022, the Appellant filed Application No 23-5190 to historically designate the Property and, again, the Historic Preservation Officer determined that the Property does not meet the minimum eligibility criteria for designation as a local historic landmark. A copy of the November 29, 2022 Letter is attached as **Exhibit 2**.

On December 29, 2022, the Appellant filed a revised application requesting that the Board reverse the Historic Preservation Officer's determination and to designate the Property as a local historic landmark (the "**Application**"). Upon reviewing the Application, the City's Historic Preservation Officer issued its staff report, which, for the third time, concluded that the Property did not meet the minimum eligibility criteria under the City Code for designation as a local historic landmark. A copy of the staff report is attached as **Exhibit 3**.

Subsequently, on January 18, 2023, the Board heard the Application, and, after a lengthy public hearing, the Board concluded that the Property did not meet the minimum eligibility criteria for designation as a local historic landmark under the City Code. The Appellant has now filed this appeal of the Determination (the “**Appeal**”).

## MEMORANDUM OF LAW

### **I. The Appellant Does Not Have Standing to Appeal the Historic Preservation Board’s Determination.**

Under Florida law, the Appellant does not have standing to file this Appeal. The issue of standing is a threshold inquiry which must be made at the outset of a proceeding before addressing the merits. *Ferreiro v. Philadelphia Indem. Ins.*, 928 So. 2d 374, 376 (Fla. 3d DCA 2006). In other words, before the Commission considers the merits of the Appeal, the Commission must first determine whether the Appellant has standing to challenge the Determination.

In order to have standing to challenge the Determination, under Florida law, the Appellant must demonstrate that they have a legally cognizable, definite interest that is different than the general interest of the community at large. *Renard v. Dade County*, 261 So. 2d 832, 837 (Fla. 1972). The cognizable legal interest must be definite and exceed the general interest of the community. *Id.*

Here, the Appellant fails to demonstrate a legally sufficient interest. Instead, at best, the Appellant merely asserts a generalized complaint that fails to demonstrate any injury, which differs in kind from the impact to the community as a whole. Generalized complaints do not demonstrate the requisite interest required to establish standing. *Friguls v. City of Coral Gables, NP* (Fla. 11th Cir. Ct. Oct. 20, 2016) (holding that the petitioners lacked standing because they did not demonstrate how the project will impact them more negatively than the general community and asserted only generalized complaints).

In its entirety, this Appeal states:

“I [ . . . ] am appealing the [Determination] to the Coral Gables City Commission on January 30, 2023. For the Garden of Our Lord. 110 Phoenetia Ave.”

The Appeal does not provide how the Determination impacts the Appellant more negatively than the general community. Thus, the Appellant does not possess standing. *See Carlos Estates, Inc. v. Dade County*, 426 So. 2d 1167, 1169 (Fla. 3d DCA 1983); *Friguls v. City of Coral Gables, NP* (Fla. 11th Cir. Ct. Oct. 20, 2016). In *Friguls*, the petitioners appealed a decision by the Coral Gables City Commission approving a development application. The petitioners argued they had standing to appeal the decision because they spoke at the City Commission hearing. Specifically, one petitioner complained that the project is not compatible with the neighborhood because it is “not low density and low volume.” At the same City Commission hearing, the second petitioner complained that the project “is three times the size permitted by the current zoning.”

Despite stating their objections to the proposed development, the Eleventh Judicial Circuit Court upheld that the petitioners did not have standing to appeal because they did not demonstrate how the project would impact them more negatively than the general community. In the present case, the Appellant, like their counterparts in *Friguls*, lacks standing to appeal the Determination. Neither the Appeal, nor the evidence of record, provide any grounds demonstrating how the Determination impacts the Appellant more negatively than the general community. The Appeal is simply a one-sentence assertion that, at best, is a generalized complaint. Thus, the Appellant does not have standing to appeal the Determination under Florida law.

The City Code also expands the eligibility requirements for standing further than Florida law allows. The City Code allows any “aggrieved party” to appeal a decision of the Board. Under the City Code, “aggrieved” includes “any applicant.” See *Solares v. City of Miami*, 166 So. 3d 887, 889 (Fla. 3d DCA 2015) (stating “a city charter cannot expand or contract the principle of standing which ultimately sounds in the express separation of powers provision of Article II, Section 3 of the Florida Constitution.”). Here, the City Code confers standing on “any applicant,” without requiring the Appellant to demonstrate a special injury, which runs in direct opposition to Florida law under *Renard*. See 261 So. 2d 832, 837 (Fla. 1972) (holding that in order to have standing, the Appellant must demonstrate that they have a legally cognizable, definite interest that is different than the general interest of the community at large).

Under *Renard*, the factors considered to determine whether a person is an “aggrieved party” are: (1) proximity to the property which is the subject of the decision; (2) character of the neighborhood; (3) type of change being sought; and (4) whether the person challenging the decision was entitled to receive notice of the proposed action. Here, the Appellant alleges to reside approximately 200 feet from the Property. The Appellant may live near the Property, however, as the court stated in *Battaglia Fruit Co. v. City of Maitland*, proximity to the subject property does not “in and of itself establish a legal interest adversely affected” by the Determination.<sup>1</sup> In regard to the second and third factors, the Determination did not change the character of the neighborhood as no zoning or development approvals are being considered, and application of the existing zoning remains unchanged. The Determination was simply to designate the Property as a local historic landmark. Additionally, as the City argued in *Friguls*, and as the Florida Supreme Court has explained, “the fact that a person is among those entitled to receive notice under the zoning ordinance is a factor to be considered. However, [ . . . ], *notice requirements are not controlling on the question of who has standing.*” 261 So. 2d at 837 (emphasis added). Thus, because the Appellant failed to demonstrate that they have a cognizable legal interest that exceeds the general interest of the community, the Appellant does not have standing under Florida law.

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<sup>1</sup> See *Battaglia Fruit Co. v. City of Maitland*, 530 So. 2d 943, 944 (Fla. 5th DCA 1988).

**II. The Appeal is Deficient Because the Appellant Did Not Pay the Appeal Filing Fee and Does Not Meet the Filing Fee Waiver Requirements by City Code.**

The Appellant did not pay the required appeal fee when they submitted the Appeal, nor is the Appellant eligible to obtain the filing fee waiver. The Coral Gables Fee Development Schedule, as adopted by Ordinance No. 2015-17, as amended, requires that all appeals of the Board must be accompanied by a filing fee of \$913.50. In certain cases, pursuant to Resolution No. 2014-224 (the “**Resolution**”), an appellant may request a waiver of appeal fees. Here, the Appellant has failed to establish that she meets the criteria under the Resolution for a waiver of appeal fee.

The Resolution allows the City Attorney, with the approval from the City Manager to grant a fee waiver where the following conditions are presented by the applicant:

1. The applicant resides within 1,000 feet of the property at issue in the appeal *and the applicant’s residential use is affected by the appeal*;
2. The applicant’s income is equal to or below 200% of the current federal poverty guidelines prescribed by the United States Department of Health and Human Services; and
3. The applicant appeared at the hearing and presented objections to the Board action being appealed or submitted written objections in advance of the hearing.

Here, the Determination does not affect the Appellant’s residential use of their residence and the Appellant failed to establish how their residential use would be affected by the Determination, as required by the Resolution. The Determination that the Property does not meet the minimum eligibility requirements as a local historic landmark does not affect the Appellant’s residential use of their Property. Further, the Appellant has not provided or asserted how their residential use would be affected by the Appeal, which would support the waiver of applicable appeal fees. The Determination did not cause any adverse impact to the Appellant’s use of her residence or cause any impact to the use and enjoyment of her residence.

As a result, the Appeal should be dismissed because the Appeal was not accompanied by payment of the appeal fee, as required by City Code, or an explanation as to how the Appellant has been affected by the Determination. Florida courts have consistently held that failure to pay the required appeal fee is grounds for dismissal. *Metropolitan Dade County v. Howard S. Goldberg*, 687 So. 2d 7, 8 (Fla. 3d DCA 1997) (“appellant appealed to the appellate division of the circuit court, but the appeals were dismissed for failure to pay the required filing fees”); *Miami Beverly LLC v. City of Miami*, 225 So. 3d 989 (Fla. 3d DCA 2017) (holding that, “the appellant[‘s] [. . .] appeal was dismissed for failure to pay the filing fee”); *Penn-American Insurance Company v. Silver Oaks Mobile Home Park Partnership, LLC*, 90 So. 3d 294 (Table) (Fla. 3d DCA 2012) (holding that “this non-final appeal is hereby dismissed as appellant [. . .] has failed to pay the filing fee”).



Therefore, because the Appeal was not accompanied by the required filing fee, the Appellant did not comply with City Code and the Appeal should be dismissed as it failed to comply with the essential requirements of law. *Dougherty ex rel. Eisenberg v. City of Miami*, 23 So. 3d 156, 159 (Fla. 3d DCA 2009) (holding that “the City is bound by the procedural requirements imposed by the code and cannot renege on its promise to its citizens to uphold the code.”).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Navarro', written in a cursive style.

Jorge Navarro, Esq.

Enclosures

cc:

Mrs. Cristina M. Suarez, City Attorney  
Mr. Warren Adams, Historic Preservation Officer

## Exhibit 1



*Historical Resources &  
Cultural Arts*

August 9, 2021

2327 SALZEDO STREET  
CORAL GABLES  
FLORIDA 33134

ST. JAMES EVANG LUTHERAN CHURCH  
110 Phoenetia Avenue  
Coral Gables, Florida 33134-3312

☎ 305.460.5093  
✉ hist@coralgables.com

Re: 110 Phoenetia Avenue, legally described as Lots 1 to 10 INC, Block 21, Coral Gables Douglas Section, according to the Plat thereof, as recorded in Plat Book 25, Page 69, of the Public Records of Miami-Dade County, Florida.

Dear Property Owner:

Section 8-107(g) of the Coral Gables Zoning Code states that "All demolition permits for non-designated buildings and/or structures must be approved by the Historic Preservation Officer or designee. The approval is valid for eighteen (18) months from issuance and shall thereafter expire and the approval is deemed void unless the demolition permit has been issued by the Development Services Department. The Historic Preservation Officer may require review by the Historic Preservation Board if the building and/or structure to be demolished is eligible for designation as a local historic landmark or as a contributing building, structure, or property within an existing local historic landmark district. This determination of eligibility is preliminary in nature and the final public hearing before the Historic Preservation Board on Local Historic Designation shall be within sixty (60) days from the Historic Preservation Officer determination of "eligibility." Consideration by the Board may be deferred by mutual agreement by the property owner and the Historic Preservation Officer. The Historic Preservation Officer may require the filing of a written application on the forms prepared by the Department and may request additional background information to assist the Board in its consideration of eligibility. Independent analysis by a consultant selected by the City may be required to assist in the review of the application. All fees associated with the analysis shall be the responsibility of the applicant. The types of reviews that could be conducted may include but are not limited to the following: property appraisals; archeological assessments; and historic assessments."

Therefore, please be advised that after careful research and study of our records and the information you presented the following information has been determined:

**110 Phoenetia Avenue, legally described as Lots 1 to 10 Inc., Block 21, Coral Gables Douglas Section, according to the Plat thereof, as recorded in Plat Book 25, Page 69, of the Public Records of Miami-Dade County,**

**Florida, does not meet the minimum eligibility criteria for designation as a local historic landmark. Therefore, the Historical Resources staff will not require review by the Historic Preservation Board if an application is made at this time for a demolition permit.**

Please note that, pursuant to Section 14-107.5(b)(15) of the Coral Gables Zoning Code, this determination does not constitute a development order and is valid for a period of eighteen (18) months. In the case where the Historic Preservation Officer or designee determines that the property does not meet the minimum eligibility criteria for designation, a permit for the demolition of the property must be issued within the eighteen-month period.

Upon expiration of the eighteen-month period, you will be required to file a new application. Any change from the foregoing may be made upon a demonstration of a change in the material facts upon which this determination was made.

If you have any further questions concerning this matter, please do not hesitate to contact this office.

Sincerely,



Warren Adams  
Historic Preservation Officer

cc: Jorge L. Navarro, Esq., 333 SE 2<sup>nd</sup> Avenue, Suite 4100, Miami, Florida 33131  
Miriam Soler Ramos, City Attorney  
Cristina M. Suárez, Deputy City Attorney  
Gustavo Ceballos, Assistant City Attorney  
Suramy Cabrera, Development Services Director  
Devin Cejas, Deputy Development Services Director, Zoning Official  
Ramon Trias, Assistant Development Services Director, Planning Director  
Dayron Garcia, Plans Processor Lead  
Historical Significance Request Property File



**CITY OF CORAL GABLES  
HISTORICAL RESOURCES DEPT INVOICE  
LETTER OF HISTORIC SIGNIFICANCE**

PERMIT ID: 317437

405 Biltmore Way - Coral Gables, FL 33134  
(305) 460-5235

**Site Address:** 110 PHOENETIA AVE  
CORAL GABLES, FL 33134-3312

**PERMIT NUMBER:** **HI-21-08-7640**

**PARCEL NUMBER:** **03-4108-009-1840**

**Project Name:**  
**Legal Description:**  
CORAL GABLES DOUGLAS SEC PB 25-69 LOTS 1 TO 10 INC BLK 21 LOT SIZE 64337 SQUARE FEET

**Applicant:**  
GREENBERG TRAURIG  
8400 NW 36 ST  
SUITE 400  
MIAMI, FL 33166

**Owner:**  
ST JAMES EVANG LUTHERAN CH  
110 PHOENETIA AVE  
CORAL GABLES, FL 33134-3312

**Contractor:**

**Cust. #:** 015884

**Tenant:**

**Qualifier:**  
**Bus. License:**

**Project Description:**  
Letter of Historical Significance for 110 Phoenetia Avenue. Fee: \$761.25

|                             |   |
|-----------------------------|---|
| HISTORIC SIGNIFICANCE FEE   | N |
| REQUEST FOR SPECIAL MEETING | N |
| HPB SCHEDULED DATE          |   |

CALL THE AUTOMATED REQUEST SYSTEM TO SCHEDULE AN INSPECTION 305-722-8700  
SCHEDULE AN INSPECTION VIA THE WEB: WWW.CORALGABLES.COM

BUILDING & ZONING: 305-460-5245  
FIRE: 305-460-5563



HI-21-08-7640

| FEES                      |                 |
|---------------------------|-----------------|
| HISTORIC SIGNIFICANCE FEE | 761.25          |
| <b>TOTAL:</b>             | <b>\$761.25</b> |

Issued Date:

Expiration Date: 02/07/2023

CALL BEFORE YOU DIG FOR ALL UTILITY LOCATES  
 SUNSHINE STATE ONE CALL  
 1-800-432-4770

**MASTER PERMIT**

| Required Inspections:  |                      |                        |
|------------------------|----------------------|------------------------|
| <u>Inspection Code</u> | <u>Complete Code</u> | <u>Inspection Name</u> |
|                        |                      |                        |

CALL THE AUTOMATED REQUEST SYSTEM TO SCHEDULE AN INSPECTION 305-722-8700  
 SCHEDULE AN INSPECTION VIA THE WEB WWW.CORALGABLES.COM

BUILDING & ZONING: 305-460-5245  
 FIRE: 305-460-5563



HI-21-08-7640

City of Coral Gables  
Historical Resources  
405 Biltmore  
Coral Gables, FL 33134  
3054605351  
Welcome

016147-0003 Nancy L. 08/09/2021 04:14PM

**PERMITS & INSPECTIONS**

GREENBERG TRAUIG  
HI-21-08-7640  
LETTER OF HISTORIC  
SIGNIFICANCE  
Letter of Historical  
Significance for 11  
pending  
2021 Item: HI-21-08-7640  
HISTORIC SIGNIFICANCE  
FEE 761.25

761.25

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761.25

Subtotal 761.25

Total 761.25

CHECK 761.25

Check Number 921133

Change due 0.00

Paid by: GREENBERG TRAUIG

Comments: LETTER OF HISTORIC  
SIGNIFICANCE FOR:  
110 PHOENETIA AVE  
CORAL GABLES, FL 33134-3312  
PERMIT NUMBER: HI-21-08-7640  
PARCEL NUMBER: 03-4108-009-1840  
CUSTOMER NUMBER: 015884  
PAID BY:  
GREENBERG TRAUIG  
8400 NW 36 ST  
SUITE 400  
MIAMI, FL 33166

Thank you for your payment

CUSTOMER COPY

THIS CHECK IS VOID WITHOUT A GREEN & BLUE BORDER AND BACKGROUND PLUS A KNIGHT & FINGERPRINT WATERMARK ON THE BACK - HOLD AT ANGLE TO VIEW

**GT GreenbergTraurig**  
8400 N.W. 36th Street  
Suite 400  
Doral, FL 33166

TO THE ORDER OF  
**City of Coral Gables**

**Wells Fargo, N.A.**  
Florida

**No. 921133**  
63-751631

**PAY** *Seven hundred sixty-one and 25/100*

DATE 7/15/2021

NON-NEGOTIABLE AFTER 90 DAYS FROM ISSUE

**\*\*761.25\*\***

TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$10,000.00  
Operating Account

*Debra J. Alvarez*

VOID IF OVER \$761.25

921133

Exhibit 2



Historical Resources &  
Cultural Arts

2327 SALZEDO STREET  
CORAL GABLES  
FLORIDA 33134

☎ 305.460.5093  
✉ [hist@coralgables.com](mailto:hist@coralgables.com)

November 29, 2022

Ms. Bonnie D. Bolton  
42 Phoenetia Avenue  
Coral Gables, FL 33134

Re: 110 Phoenetia Avenue  
Local Historic Landmark Designation Application

Dear Ms. Bolton:

This letter is in response to the application for local historic designation of 110 Phoenetia Avenue that you filed on August 19, 2022. Article 8, Section 8-103 of the Coral Gables Zoning Code states that “in order to qualify for designation as a local historic landmark or local historic landmark district, individual properties must have significant character, interest or value as part of the historical, cultural, archaeological, aesthetic, or architectural heritage of the City, state or nation. For a multiple property nomination, eligibility will be based on the establishment of historic contexts, of themes which describe the historical relationship of the properties.”

Please be advised that after careful research and study of our records, along with the information provided with the application, it is the determination of this office that 110 Phoenetia Avenue does not qualify as presented for listing as a Local Historic Landmark in the Coral Gables Register of Historic Places.

Pursuant to Article 8, Section 8-104 A. 1., “if the department’s initial determination is that the property does not meet the minimum eligibility criteria for listing, the applicant may present the proposal for designation to the Historic Preservation Board.” If you desire to present this proposal to the Historic Preservation Board, it must be at the December 21, 2022, Historic Preservation Board meeting.

**A copy of your report and a courtesy notice must be mailed to the property and the property must be posted. In addition, notices must be sent to all properties within 1,000 feet of the address. This office will provide you with the notices, the envelopes, the posts, and a list of companies that can provide you with the labels. You are responsible for the mailings and the posting of the property. The notices must be postmarked by Thursday, December 8, 2022.**

If you have any further questions, please do not hesitate to contact this office. Thank you for your interest in historic preservation.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Adams". The signature is fluid and cursive, with a large initial "W" and a long, sweeping tail.

Warren Adams  
Historic Preservation Officer

cc: File: LHD 2022-014  
Miriam S. Ramos, City Attorney  
Gus Ceballos, Assistant City Attorney





Historical Resources &  
Cultural Arts

2327 SALZEDO STREET  
CORAL GABLES  
FLORIDA 33134

☎ 305 460 5093  
✉ hist@coralgables.com

**STAFF REPORT  
LOCAL HISTORIC DESIGNATION REQUEST  
FOR THE PROPERTY AT  
110 PHOENETIA AVENUE  
"THE GARDEN OF OUR LORD"**

**Application:** December 29, 2022: a designation application was submitted to the Historic Preservation Office by Bonnie D. Bolton.

**Folio Number:** 03-4108-009-1840

**Legal Description:** Lots 1 to 10 inclusive, Block 21, Coral Gables Douglas Section, according to the Plat thereof, as recorded in Plat Book 25, at Page 69, of the Public Records of Miami-Dade County, Florida.

**Original Permit No.:** 19662M

**Date of Construction:** 1951

**Original Architect:** Robert Fitch Smith

**Original Owner:** St. James Evangelical Lutheran Church

**Present Owner:** Century Crystal Group LLC

**Type:** Landscape Feature

**Site Characteristics:** The property comprises an entire city block situated between Phoenetia Avenue to the north, Antilla Avenue to the south, E. Ponce de Leon Boulevard to the west, and Galiano Street to the east. The property is located across Phoenetia Avenue from the Coral Gables Woman's Club within the North Ponce Neighborhood Conservation District Overlay.

**BACKGROUND/EXISTING CONDITIONS**

The subject comprises a landscape feature known as the Garden of Our Lord designed as part of the St. James Evangelical Lutheran Church property. The City Code defines a Landscape Feature as "any site improvement or vegetation including outbuildings, walls, courtyards, fences, shrubbery, trees, sidewalks, planters, plantings, gates, street furniture, signs, exterior lighting, paving, trellis, arbor, fountain, pond, garden sculpture, garden lighting, decking, patio, decorative paving, gazebo and other similar elements."

The church building, which has been significantly altered, was built in 1946 and the landscape feature was created in 1951. The architect for the church and garden elements was Robert Fitch Smith. Other structures on the site include church ancillary buildings, a single-family residence currently used as a school, and a playground.

On July 21, 2021, a Historic Significance Request was submitted to the Preservation Office for a determination on whether the site was historically significant or not. On August 9, 2021, Historic Preservation Staff responded that, after careful research and study of City records and the information presented by the applicant, the property did not meet the minimum eligibility criteria for designation as a local historic landmark.

The property was purchased by the current owner on approximately November 24, 2021.

On January 28, 2022, the property owner appeared before the Development Review Committee for review of a proposed new development of the site comprising a Comprehensive Plan Map Amendment, Zoning Code Map Amendment, Planned Area Development (PAD), Mixed-Use Site Plan, and Transfer of Development Rights Receiving Site Plan.

On August 19, 2022, Bonnie D. Bolton submitted a Historic Designation application for the site to the Historic Preservation Office. The applicant and the property owner agreed to allow Staff sufficient time to review the submittal.

On November 29, 2022, it was determined by the Historic Preservation Office that after careful research and study of City records along with information provided with the application, the property did not qualify as presented for listing as a Local Historic Landmark. Ms. Bolton was informed that the application and request should be presented to the Historic Preservation Board at the meeting of December 21, 2022.

*Pursuant to Article 8, Section 8-104 A. 1 of the Code, "if the department's initial determination is that the property does not meet the minimum eligibility criteria for listing, the applicant may present the proposal for designation to the Historic Preservation Board. The applicant must submit a report within 30 days of the eligibility determination which describes in sufficient detail the criteria the potential historic landmark satisfies for designation. The applicant will then present at the next regularly scheduled Historic Preservation Board meeting where notice can be provided."*

On December 2, 2022, Ms. Bolton requested 30 days to submit an amended report. The request was granted, and a final designation report was submitted to the Preservation Office on December 29, 2022.

#### **STAFF OBSERVATIONS**

Per the historic designation report, the applicant states 110 Phoenetia Avenue, "The Garden of Our Lord" is eligible for historic landmark designation under the following criteria:

A. Historical, cultural significance:

2. Is the site of an historic event with significant effect upon the community, city, state, or nation;
4. Exemplifies the historical, cultural, political, economic, or social trends of the community;
5. Is associated in a significant way with a past or continuing institution, which has contributed, substantially to the life of the City.

B. Architectural significance:

1. Portrays the environment in an era of history characterized by one (1) or more distinctive architectural styles;
2. Embodies those distinguishing characteristics of an architectural style, or period, or method of construction;
3. Is an outstanding work of a prominent designer or builder;
4. Contains elements of design, detail, materials or craftsmanship of outstanding quality or which represent a significant innovation or adaptation to the South Florida environment.

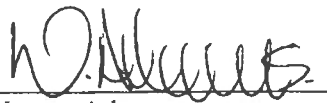
C. Aesthetic significance:

1. By being a part or related to a subdivision, park, environmental feature, or other distinctive area, should be developed or preserved according to a plan based on an historical, cultural, or architectural motif;
2. Because of its prominence of spatial location, contrasts of siting, age, or scale, is an easily identifiable visual feature of a neighborhood, village, or the City and contributes to the distinctive quality or identity of such neighborhood, village, or the City. In case of a park or landscape feature, is integral to the plan of such neighborhood or the City.

**STAFF CONCLUSION**

After careful research and study of available records and the information provided with the application, the Historic Preservation Office has determined **110 Phoenetia Avenue**, legally described as Lots 1 to 10 Inc., Block 21, Coral Gables Douglas Section, according to the Plat thereof, as recorded in Plat Book 25, Page 69, of the Public Records of Miami-Dade County, Florida, does not meet the minimum eligibility criteria for designation as a local historic landmark.

Respectfully submitted,

  
Warren Adams  
Historic Preservation Officer