



FLORIDA DEPARTMENT of STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

Mr. Warren Adams
Historic Preservation Officer
City of Miami Planning Department
444 SW 2nd Ave, 3rd Floor
Miami, FL 33130

March 1, 2019

RE: DHR Project File No.: 2019-968, Received by DHR: February 5, 2019
Coconut Grove Playhouse, Miami, Florida

Dear Mr. Adams:

Our office reviewed Miami-Dade County's plans for the Coconut Grove Playhouse (Playhouse) at the request of the City of Miami's Historic and Environmental Preservation Board (HEPB), and pursuant to Sections 267.061(2) and (3), *Florida Statutes*, and Section 34 of the lease of the Playhouse site between the State of Florida and Florida International University and Miami-Dade County.

As noted in your email, the Coconut Grove Playhouse is listed in the National Register of Historic Places. The National Register nomination states that the Coconut Grove Playhouse is significant at the local level under Criterion A in the area of Entertainment and Recreation and Criterion C for its Mediterranean Revival architecture. The period of significance for the property includes 1927, the original construction date, and 1956 to 1970, the Coconut Grove Playhouse's "golden age."

As requested, our office has reviewed Miami-Dade County's plans and we are responding to the HEPB's questions based on the historic and architectural characteristics of the property described in the National Register nomination and following the guidance provided by the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Our office reviewed the materials provided by the City of Miami as well as the document titled *Coconut Grove Playhouse: HEPB Submittal 12.14.18* provided to our office by the Miami-Dade County Department of Cultural Affairs on January 30, 2019.

Please see below our responses to the HEPB's request for guidance:

1. *Is demolition of the Playhouse structure (except solely its Southerly and Easterly facades which the County plans to preserve in its new proposed program) consistent with the Secretary of the Interior's Standards?*

The demolition of the Playhouse structure as outlined in the provided plans is not consistent with the Standards (Standards 1, 2, 4, 5, 6, 9, and 10). (See November 7, 2017 email, from Dr. Timothy Parsons to Mr. Michael Spring)

2. *Would demolition of the Playhouse structure (except its Southerly and Easterly facades) amount to, or reasonably be considered as, having an adverse effect on a historic property?*

Yes, our office would consider demolition of the Playhouse as outlined in the provided plans to be an adverse effect to this historic property based on the resulting loss of the property's historic character and integrity.

3. *Are the plans for the two exterior facades which are to be saved consistent with the original plans and consistent with the requirements of the National Register designation of the Playhouse?*

The proposed façade restoration appears to be consistent with the Playhouse's original 1927 design. However, National Register guidelines and the Secretary of the Interior's Standards recognize that changes over time to a property acquire historic significance in their own right. Therefore, the alterations made in the 1956 to 1970 period of significance are also considered historic. We recommend that the building be restored to a certain time period – in this case either 1927 or 1956 to 1970 – and not receive treatments consistent with multiple time periods. In the context of the proposed project, our office does not consider restoring the façade to the 1927 design to be inappropriate, as long as the remainder of the building is consistent with that period.

4. *Please address whether the open-air "paseo space" which is proposed for the interior sides of the to-be-saved Southerly and Easterly facades is true to the original design for a theater lobby and the National Register designation.*

The original 1927 design for the Playhouse did not include an open air lobby. The open-air design is not consistent with the National Register designation.

5. *Were the Playhouse demolished (with the exception of its Southerly and Easterly facades), would this likely impact the recent National Register designation? If so, would you please elaborate what that impact would be?*

Yes, demolition may affect the Playhouse's National Register designation. If the proposed plans are implemented the property will no longer possess the historic character and integrity that allowed the property to be listed in the National Register. Therefore, the Playhouse could be removed from the National Register.

6. *Any other matters which the DHR considers relevant to this matter.*

Our office recommends restoring the Playhouse in a manner consistent with the Standards. This will allow the property to retain the historic character and integrity that are the basis for the Playhouse's National Register designation. The Standards are flexible and allow for a property to be modernized and improved to meet current needs while still maintaining the historic nature of the property.

Since the Playhouse is a state-owned property the provisions of Section 267.061(2)(b), *Florida Statutes* related to the resolution of adverse effects apply to the proposed project. Section 267.061(2)(b) directs state agencies "to determine that no feasible and prudent alternative to the proposed demolition or alteration exists, and, where no such alternative is determined to exist, to assure that timely steps are taken either to avoid or mitigate the adverse effect." Our office

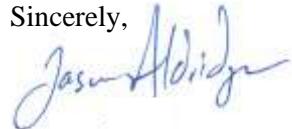
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recommends that Miami-Dade County (lessee) and the Florida Department of Environmental Protection, Division of State Lands (DEP) (lessor) consult to evaluate potential alternatives to the Playhouse's proposed demolition. If the demolition cannot be avoided, we recommend that Miami-Dade County and DEP consult with our office and the City of Miami to develop an appropriate mitigation strategy for the Playhouse's demolition.

We note that several aspects of the proposed project address a potential mitigation strategy for the project. Including, retaining and restoring the primary façade to the 1927 design, retaining and reusing some interior historic elements, and displaying and interpreting the Playhouse's history within the new building. However, we recommend a final mitigation strategy include additional measures based on further consultation between Miami-Dade County, the City of Miami, DEP, and our office.

If you have any questions, please contact me by email at *Jason.Aldridge@dos.myflorida.com*, or by telephone at 850-245-6344.

Sincerely,



Jason Aldridge
Deputy State Historic Preservation Officer
for Compliance and Review