



200 S. Biscayne Boulevard
Suite 300, Miami, FL 33131

www.brzoninglaw.com

305.377.6231 office
305.377.6222 fax
mlarkin@brzoninglaw.com

January 11, 2026

VIA ELECTRONIC MAIL

Michael Belush, Planning & Design Officer
Planning Department
City of Miami Beach
1700 Convention Center Drive, 2nd Floor
Miami Beach, Florida 33139

RE: **HPB25-0645** - 235 Washington Avenue, Miami Beach -
Narrative Responses to Staff Comments

Please allow this letter to serve as the required narrative responses to the deficiency comments issued on January 5, 2026, relating to File No. HPB25-0645.

1. HPB Plan Review.

- A recommendation on the total demolition requires further review by the Planning Director. Staff MAY recommend the retention of the front portion of the building or may recommend that the front façade be retained as part of an architectural site feature, or that a new 2-story interpretive site wall be constructed, that recalls the original structure on the site.

Acknowledged. However, please note that the Structural Condition Assessment Report (“Structural Report”) concludes that the structure exhibits widespread deterioration, with multiple primary structural systems in poor condition, and that the building does not comply with current building code requirements. See Structural Report at 11-12. As documented in the Structural Report, the systemic nature of the structural deficiencies throughout the structure establishes that the structural integrity of the building (including wood and concrete structural components as well as the foundation) does not lend itself to renovation, partial retention, or incorporation of existing structural elements that rely upon any existing structural components.

Additionally, retention of portions of the structure or construction of a new interpretive wall would substantially encroach upon the limited space needed for the recreation area, and curtail the ability to provide meaningful, code-compliant recreational open space on the Property to be used by the students of the Basecamp 305 School. The proposed project prioritizes the creation of functional outdoor recreational space that will serve the abutting school, which would be compromised by the preservation of deteriorated structural elements that no longer provide viable structural or programmatic value. Finally, even a newly constructed wall would require structural support braces that would encroach into the needed school recreational area. The proposed historic display plaque will provide homage to the existing structure while avoiding use of the existing structure or building a new tall site wall that will undermine the intended use by the adjacent school and diminish the already limited recreational space.

2. HPB Plan Review

- Provide a structural condition assessment report prepared by a registered structural engineer that outlines the conditions of the primary structural systems of the building including roof framing, floor framing, bearing walls and foundations. Staff cannot support demolition of this contributing building without reviewing the structural report analysis.

Provided. The Structural Condition Assessment Report, prepared by a registered structural engineer, has been submitted as part of the application materials. As detailed in the Structural Condition Assessment Report, the primary structural systems of the building, including the roof framing, floor framing, bearing walls, and foundations, exhibit widespread deterioration, with multiple systems in poor condition, and the structure does not comply with current building code requirements. The Structural Condition Assessment Report concludes that the extent and systemic nature of these deficiencies render repair, rehabilitation, or partial retention infeasible and unsafe, and therefore recommends demolition. See Structural Report at 11-12.