

## Re: Guidance on Historical Eligibility Research for The Islander

Lucas, Kyra <Kyra.Lucas@dos.fl.gov>
To: Lisa Joaquin lisajoaquin1221@gmail.com>

Thu, Sep 4, 2025 at 3:40 PM

Hello Ms. Joaquin,

Note to Islander Owners

Below is the full email correspondence (4 emails) between myself and Dr. Lucas at 1

Bureau of Historic Preservation. For clarity, I have highlighted the most pertinent information at the top — specifically her confirmation that a letter of eligibility is sufficient. You are welcome to read through the entire thread for context.

1) Letter of Eligibility and the 50% Rule

Can you please confirm whether a formal letter of eligibility from your office is sufficient for the local jurisdiction to apply the NFIP/FEMA historic exception (so that repairs can proceed without triggering elevation requirements), as long as the buildings retain their historic integrity? Or would a full National Register nomination be required before that exception could apply?

Yes, a letter of eligibility should be sufficient. The way it works is that NFIP/FEMA ask the Florida Master Site File (FMSF) which properties are eligible for the NR or listed on the NR. When my team and I send the eligibility letters to owners, we simultaneously submit all the PSIQ documentation to the FMSF and they automatically update their database. The letter should be enough to apply for the exemption, and their verification with our office (FMSF) should solidify it.

2) Timing of a Full Nomination

If the eligibility letter is sufficient for repair purposes, would delaying pursuit of a full nomination in any way affect our ability to use that exception? In other words, can the property remain eligible indefinitely, provided the integrity is maintained, or is there a timeframe in which we would need to move forward with the nomination?

An eligibility letter should be sufficient as properties are not required to be listed on the National Register in order to received the exemption. They simple need to be eligible. That eligibility remains so long as the integrity is there. There is no real timeframe. We rely heavily on crowdsourcing information so we have determinations that were made back in the 80s that haven't changed but aren't listed. This is especially common amongst properties with owner opposition.

Best Regards,

[Quoted text hidden]



## Re: Guidance on Historical Eligibility Research for The Islander

**Lisa Joaquin** <a href="mailto:sajoaquin1221@gmail.com">lisajoaquin1221@gmail.com</a>
To: "Lucas, Kyra" < Kyra.Lucas@dos.fl.gov>

Thu, Sep 4, 2025 at 5:13 PM

Good afternoon, Dr. Lucas,

Thank you so much for the clarification — this is tremendously helpful. Knowing that the eligibility letter alone is sufficient for the NFIP/FEMA historic exception, and that eligibility remains valid indefinitely so long as the integrity is maintained, provides the reassurance many of our owners have been seeking.

I am diligently working on compiling the additional documentation you outlined and will send it along to you upon completion. I truly appreciate your guidance and the time you've taken to walk me through this process.

With gratitude, Lisa Joaquin [Quoted text hidden]



## Re: Guidance on Historical Eligibility Research for The Islander

Lucas, Kyra <Kyra.Lucas@dos.fl.gov>
To: Lisa Joaquin lisajoaquin1221@gmail.com>

Thu, Sep 4, 2025 at 2:10 PM

Good Afternoon Ms. Joaquin,

Thank you for your patience in our office's reply as we deal with the close-out season for our small matching grants, which requires an exceptional amount of my teams' time in a very limit and rapid time frame.

Please see responses to your questions below in blue:

Does a property need to be the very first of its type, or is being one of the earliest examples sufficient for historic consideration? Historic resources do not need to be the first or only or last remaining of its type to qualify. However, such qualifiers assist in arguing for its historical value. We use things like scarcity arguments to support a nomination. That being said, nothing is inherently historically significant or eligible for being the first of its type or the last remaining of its kind. When considering historic resources the biggest question we ask is WHY is it important and significant? If it is significant as a representation of trends and changes in development patterns at the local level, then something like being the first or only or last aid in that argument.

What types of documentation are most helpful for your team (e.g., photographs, plat maps, aerials, property records, newspaper archives)? For the preliminary process, photographs and aerials, especially for arguments that rely on changes in settlement and development patterns. For an actual nomination, all of them

Are there particular sources or archives you recommend we prioritize in our research? The best resources are often local resources, historical societies, archives, and nearby universities or research institutes. These are also the ones that our office typically does not have easy access to. Whereas things like plat maps, Sanborn maps, aerials, ephemera, and newspapers are much more accessible to our office through state and national databases.

We are already reviewing the Pinellas County Property Appraiser records, plat maps, Tax Collector, building permits, historic aerials, and the St. Petersburg Times, among others, but would value your direction on what carries the most weight in your review process. We do not weigh any one type of research over another, with the exception of the fact that we take local blog style histories with a grain of salt as they typically are passionate but less true that scholastic histories. That being said, the information that "carries the most weight" in our review process and throughout writing a nomination is the information that illustrates the strongest argument for significance. I encourage you to read the attached reading material to best understand significance and how its interpreted.

I also wanted to note that I confirmed directly with the Pinellas County Property Appraiser's office that ownership of The Islander is held in fee simple. From my understanding, this means the nomination for historic designation would require approval or acceptance by the owners themselves, rather than the current board. This distinction feels important, since it ensures the decision about The Islander's future ultimately rests with the ownership group if your team deems the property eligible. This is also my understanding of how a fee simple nomination of a condo works. Property ownership gets treated like a district with each fee simple owner getting an equal vote in the nomination. Each unique property owner (whether it be a person or entity) gets a single vote. Folks do not get more votes based on how many resources they own within the boundary nor based on what share of the property they own.

What is the process when you make your determination and if we're found eligible how does it work after that? Once my team and I make a determination we do create a letter, called a letter of eligibility or determination letter depending on who you ask. This letter states whether or not our office thinks the property is eligible and outlines the basics of how we think it is eligible. By this I mean, whenever possible, we identify the boundaries of the nomination, the period of significance, and the National Park Service Criterion and subcategory of significance. This letter is usually sent to the person who submitted the PSIQ. In some cases, we may also send it to local government partners or other property owners. However, we are only obligated to notify the person who submitted the PSIQ in the case of a district.

Overall Process for National Register Nomination:

Step 1: PSIQ phase

Step 2: Drafting a Nomination. While our office does occasionally write our own nominations (in-house as we call it) we do not offer this up to everyone because we do not have the time, resources, or staff to do this. Our current backlog for in-house nominations is about 3 years. Instead, most nominations are either written by the applicant themselves or by a professional preservationist/historian/cultural resource firm/etc. that are hired by the applicant. It is easiest for my office to accept a draft nomination and then provide extensive feedback and instructions on how to improve a nomination to the level of information, documentation, and argumentation required to support a designation. We do provide the National Park Service instructions manual at the beginning of this step, however, people typically ignore that.

Step 3: Editing. The nomination will be assigned to whomever of my staff I think is best to assist with the nomination. They each have different expertise and skillsets that lend to different types of histories and resources. Drafts are sent in to our office and reviewed. We provide comments and directions. We are happy to have meetings virtually or in person as time and funding permit. Applicants resubmit newly edited drafts. This back and forth goes on as long as needed to get the document to where it needs to be, or, if I feel that there is nothing else an applicant can add to a nomination, we may take it on in-house. If its substantially done when we take it on in-house, it gets added to the head of the in-house waiting list and not the end.

Step 4: Public Meeting. For all historic districts, including condos, we will conduct an in person public meeting to explain to the owners and stakeholders what the NR is and does and what it doesn't do, and we will answer any questions they may have.

Step 5: Final Draft. When my team and I believe that a finalized draft nomination has been reached, we scheadule it for the next available Florida National Register Review Board Meeting (NRRB). The Florida NRRB meets quarterly, usually the first Thursday of every February, May, August, and November. 30-45 days before the NRRB meeting, my team and I will send physical notification letters to every owner in the district explaining what is happening and the steps required to submit a formal "No" vote. If we do not hear back from 50%+1 of the owners stating they are against the district, we assume consent to listing. This may be a problem for this particular building as we are supposed to get owner notification contact information from the property appraisers website, which in this case only list the ownership entity as the owners and only provides their information. We would need the list of fee simple owners and their mailing address another way.

Step 6: NRRB Review. My team and I present the nomination via a powerpoint presentation to the review board in a public meeting here in Tallahassee. They vote on whether or not to submit it to the National Park Service.

Step 7: Assuming the NRRB votes to submit it to the National Park Service, our office finalizes anything still missing from the nomination packet (usually mapping is the last thing we do) and incorporate any suggestions or edits submitted by the review board. Then my staff and I transmit the entire nomination package and any support or objection letters to the National Park Service digitally.

Step 8: The National Park Service announces the nomination in the Federal Register for a public comment period of 15 days. They then have 30 days to review the nomination and render a decision about whether or not to list it on the National Register of Historic Places. (If they return it we can either continue to edit it or you can appeal the decision).

Step 9: Once it is listed on the National Register of Historic Places we will send out congratulation letters to all property owners. Every June we order fancy certificates that get signed by the Secretary of State and the Florida State Historic Preservation Officer indicating a place is listed on the NR. This is something specific to Florida. We do not provide plaques, however, owners are welcome to purchase their own plaques.

Is a letter sent to The Islander and when would that letter go out? As soon as we make a determination of eligibility. We typically send it by mail and email.

Is there a time limit to accept a nomination? No, there are no time limits to accepting nominations. We accept them any and all times. However, we do base our work load on state and office program priorities. So sometimes my staff has a lot of time to review and assist with nominations and sometimes they do not. However, we do have time limits for some things. For example, if you wanted a nomination to be reviewed at a specific meeting, lets say our November meeting, our staff would have to notify owners 30 days in advance, which means we would need a final draft that is completely approved by our office no less than 15 days before that time. I have never in my life seen a nomination go through on its first draft though and they usually require multiple rounds of edits so I encourage folks to consider that what they think is their final draft because they've been working on it without input from our office does not mean our office will consider it a final draft.

Is there a specific form that must be used? In our case, because we are fee simple, we would need a 51% of the of the ownership. Yes, there is a specific form to do an actual nomination. They are not publicly available in Florida. We send those to folks with the positive letter of determination, along with the instructions manual. This allows us to reduce the amount of nomination we get that are not eligible in the first place and the entire reason we established the PSIQ system.

Is the nomination only valid for a certain period of time? A National Register designation is forever, or at least until the building is demolished or becomes so egregiously altered that it can no longer express its historic significance (i.e. no integrity left). National Register designation is related to the physical site/building, thus it is retained regardless of transfer of ownership.

Best Regards,

Kyra Lucas

# Dr. Kyra Lucas

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From: Lisa Joaquin < lisajoaquin 1221@gmail.com>

**Sent:** Tuesday, August 26, 2025 10:57 AM **To:** Lucas, Kyra < Kyra.Lucas@dos.fl.gov>

Subject: Re: Guidance on Historical Eligibility Research for The Islander

EMAIL RECEIVED FROM EXTERNAL SOURCE

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Excerpts from NRB 15 and 16..pdf 3969K



## Re: Guidance on Historical Eligibility Research for The Islander

Lisa Joaquin < lisajoaquin 1221@gmail.com> To: "Lucas, Kyra" <Kyra.Lucas@dos.fl.gov>

Thu, Sep 4, 2025 at 2:54 PM

Good afternoon. Dr. Lucas.

Thank you again for all of the information you provided — it was extremely helpful. I do have two follow-up points that many of our owners are asking about:

### 1) Letter of Eligibility and the 50% Rule

Can you please confirm whether a formal letter of eligibility from your office is sufficient for the local jurisdiction to apply the NFIP/FEMA historic exception (so that repairs can proceed without triggering elevation requirements), as long as the buildings retain their historic integrity? Or would a full National Register nomination be required before that exception could apply?

2) Timing of a Full Nomination If the eligibility letter is sufficient for repair purposes, would delaying pursuit of a full nomination in any way affect our ability to use that exception? In other words, can the property remain eligible indefinitely, provided the integrity is maintained, or is there a timeframe in which we would need to move forward with

Your clarification on these two points will go a long way in helping us reassure owners about their options as we work through this process.

With appreciation, Lisa Joaquin

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