



REPLY TO: TALLAHASSEE

March 5, 2015

VIA ELECTRONIC MAIL AND TELEFACSIMILE

Kurt Lannon
 Clerk of the Commission
 City of Gainesville
 P.O. Box 490, Station 19
 Gainesville, Florida 32627-0490

Re: *Amended Administrative Appeal – RBL Parcel, LLC – Petition HP-15-02*

Dear Mr. Lannon:

Our law firm represents RBLWP Parcel D LLC (“Petitioner”), who is the owner of certain real property located at 1227 NW 4th Avenue, Gainesville, Florida (“Property”). On March 3, 2015, the City’s Historic Preservation Board rendered its Order denying the Petitioner’s Petition seeking a Certificate of Appropriateness to demolish a vacant, existing structure on the Property. (*See* Exhibit “A”). Pursuant to Section 30-112(d)(7)i of the City of Gainesville Land Development Code (“City’s LDC”), the Petitioner hereby appeals the Historic Preservation Board’s March 3 Order to the City Commission for a *de novo* hearing, and requests that such matter be scheduled on the City Commission’s meeting on March 19, 2015.

The basis for the Petitioner’s appeal is the Historic Preservation Board’s determination that the Petitioner allegedly failed to satisfy the criteria set forth in Section 30-112(d)(6)c of the City’s LDC for the issuance of the requested Certificate of Appropriateness for demolition. In particular, the Petitioner contests the Historic Preservation Board’s determinations concerning: (1) whether no reasonable measures can be taken to preserve the structure on the Property; (2) whether the Petitioner’s structural engineer had the requisite qualifications to assess historic structures, including rehabilitation; and (3) whether the structure on the Property is incapable of earning a reasonable economic return on its value.

I appreciate your prompt attention to this matter. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

David A. Theriaque

TALLAHASSEE
 433 NORTH MAGNOLIA DRIVE
 TALLAHASSEE, FLORIDA 32308
 (850) 224-7332
 FAX: (850) 224-7662

ORLANDO
 4767 NEW BROAD STREET
 ORLANDO, FLORIDA 32814
 (407) 514-2676
 FAX: (407) 264-6132