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KEN DETZNERSecretary of State

Michael Liu Director Public Housing and Community Development 701 NW 1st Court, 16th Floor Miami, FL 33136-3914

September 29, 2016

RE: DHR Project File No.: 2016-3065, Received by DHR: August 25, 2016

Project: GOB/Surtax/CFFP/Existing Public Housing Funding, FY 2016 – Liberty Square Public Housing Project, 1415 NW 63 Street, Miami, Florida 33147 and 1200 62 Lane, Miami, FL

33147, Case Study Submission

County: Miami-Dade

Mr. Liu:

Thank you for providing our office with a case study report for the proposed redevelopment of the Liberty Square Public Housing Project. Our office requested this case study to fulfill the Miami-Dade Public Housing and Community Development's (PHCD) responsibility under 30 CFR 800.6(a). The case study documents PHCD's efforts to develop and consider alternatives or modifications to the project that could avoid or minimize the adverse effect to the National Register-eligible Liberty Square Public Housing complex (8DA7017-8DA7145, 8DA7474). Based on the analysis provided in the report, we concur with PHCD's determination that the purpose and need of the proposed redevelopment project cannot be reasonably met through rehabilitation and reuse of the existing housing complex.

Our office recognizes that PHCD and Related Urban have engaged the public and local stakeholder organizations, such as the Dade Heritage Trust, to inform them of the proposed project and to take into consideration their comments. We recommend that PHCD continue to provide opportunities for local input, especially as relates to potential mitigation for the project. PHCD should maintain a record of public comment for consideration during the development and finalization of a mitigation plan.

With completion of the case study, PHCD is directed by 36 CFR 800.6, *Resolution of Adverse Effects* to continue consultation with our office and other consulting parties. PHCD's next step is to engage in consultation with our office and local stakeholders to develop a mitigation plan that is adequate for the scale and significance of the historic property adversely affected by the proposed undertaking. As recommended in previous correspondence from our office, the preservation of the original community center could provide a meaningful mitigation measure and would also offer a venue to share other mitigation efforts with the public, such as signage and interpretation of the Liberty Square Housing Development's history. Guidance from the Advisory Council on Historic Preservation (ACHP) also includes documentation of historic buildings, typically according to Historic American Building Survey (HABS) standards. In cases like Liberty Square with a large number of similar or identical building plans,



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it is important to document representative buildings according to HABS standards, rather than documentation of every building.

We look forward to working with PHCD to develop an appropriate mitigation plan for memorialization in a Memorandum of Agreement (MOA). As PHCD gathers additional public input and prepares to move forward in developing a mitigation plan, our office is available to provide assistance. We encourage PHCD to engage with local organizations with historic preservation experience during this process. Additionally, Housing and Urban Development (HUD) has resources to assist responsible entities through the resolution of adverse effects process and may be able to provide guidance related to drafting an MOA.

If you have any questions, please contact me by email at *Jason.Aldridge@dos.myflorida.com*, or by telephone at 850.245.6344 or 800.847.7278.

Sincerely,

Timothy A. Parsons, Ph.D.

Director, Division of Historical Resources and State Historic Preservation Officer