



September 21, 2022

Via E-Plan to: [LHull@miamigov.com](mailto:LHull@miamigov.com)

Ms. Lakisha Hull, AICP, Director  
Department of Planning  
City of Miami  
444 S.W. 2<sup>nd</sup> Avenue, 3<sup>rd</sup> Floor  
Miami, FL 33130

**Re: 2<sup>nd</sup> Amended Letter of Intent – Application for Future Land Use Map (FLUM) Amendment & Rezoning of Property Located at 1250 N.W. 22<sup>nd</sup> Ave., Miami, FL (Folio No. 01-3134-000-0230) (the “Property”)**

Dear Ms. Hull:

Our firm submits this revised letter of intent and supporting document for the above referenced Future Land Use Map (FLUM) amendment and rezoning (the “Application”) on behalf of The Polish American Club of Miami Inc. (“Applicant” or “PACOM”), owner of the Property. The Property consists of a vacant parcel of land that is approximately 80,256 sq. ft. in size. The Property is located on the West side of N.W. 22<sup>nd</sup> Avenue immediately north of the Comfort Canal and in a sub-area that is experiencing decline.

### Summary of Applicant’s Request

Applicant requests that the Property be redesignated from its present designations of *Medium Density Restricted Commercial* and *Urban Center Transect Zone Limited (T5-L)* to *Restricted Commercial* and *Urban Core Transect Zone Open (T6-8-L)*. A summary of the Applicant’s request is provided in Exhibit “A” attached hereto.

### Site History & Land Use Designations

- *Historic Use & Intended Use*

Originally founded in 1938, The Polish American Club of Miami Inc. (PACOM) has served as the focal point for Polish civic and cultural life in Miami since its founding. In 1947, Stefan Kolski was elected President of the PAC. During his two-year tenure, the club purchased the Property for its future permanent home. In 1950, Walter Zymalski was once again elected President of the PACOM and original clubhouse was erected on the Property. Within two years, the club’s growth required the design of an addition and construction on the facility’s expansion commenced in 1955.

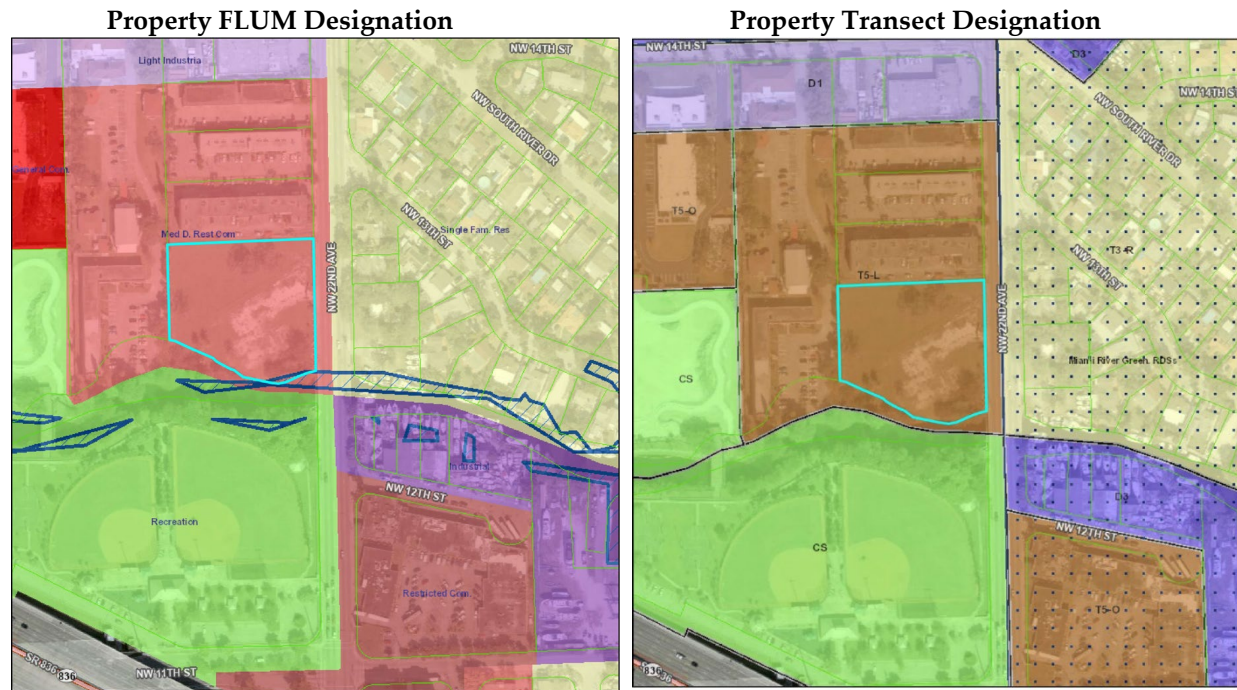
Following the completion of the expansion, PACOM became a center of social activity regularly hosting card parties, Saturday night dances, and other events that were enthusiastically attended by the community. Cultural programming also became a staple of activities at the club. Young adults and children were regularly taught the Polish language and the public was entertained with beautiful Polish folk songs and dances. PACOM also supported the visits of important Polish dignitaries, including Pope

John Paul II's visit to Miami in 1987, which efforts resulted in a donation to the Archdiocese of Miami by the club to help defray costs associated with the papal visit.

In recent years, PACOM fell on hard financial times, but the Applicant's reconstituted board of director is firmly committed to restoring PACOM's prominence within the community through the development of a new facility on the Property that can provide a home for the promotion of Poland and its culture. With the City's support, Applicant is confident that its vision of a reinvigorated PACOM on the Property as part of a mixed-use project can become a reality.

- **Current FLUM & Zoning Designations for Property & Surrounding Parcels**

Presently, the Property has a Future Land Use Map (FLUM) designation of *Medium Restricted Commercial* and a zoning transect designation of *Urban Center Zone Limited (T5-L)*. See a copy of the Property's FLUM and zoning atlas designation hereinbelow.



As evidenced by the FLUM and zoning atlas, the Property is located immediately north (across the Comfort Canal) from Fern Isle Park, which is designated *Recreation* and *Civic Space (CS)*. To its south and east, the Property is bordered by a commercial marina which is the home to numerous personal watercraft and which site is designated *Industrial* and *Waterfront Industrial District Zone (D3)*. Immediately south of the marina on the east side of N.W. 22<sup>nd</sup> Avenue is a shopping center with approximately 37,500 sq. ft. of commercial space and at-grade parking which houses a mix of retail and professional services on-site. The shopping center is designated *Restricted Commercial* and *Urban Center Zone Open (T5-O)*. Immediately east of the Property across N.W. 22<sup>nd</sup> Avenue is the Durham Park, a single-family residential subdivision comprised of slightly less than 100 homes. Immediately north of the Durham Park neighborhood is an approximately 3.3 acre site designated *Industrial* and *Waterfront Industrial District Zone (D3)*. The site remains the home of a container shipping facility operated by Antillean Marine.

On the west side of N.W. 22<sup>nd</sup> Avenue and immediately north of the Property, three (3), two and three-story multi-family residential buildings containing approximately 70 total units occupy the lots and

are each designated *Medium Density Restricted Commercial* and *Urban Center Zone Limited (T5-L)*. Immediately west of these multi-family homes are located two properties that front along the south side of N.W. 14<sup>th</sup> Street that house Community Facility and Religious Facility uses – the Police Benevolent Association (2300 NW 14<sup>th</sup> Street)(the “PBA”) and First Hungarian United Church of Christ (2250 NW 14<sup>th</sup> Street) (the “Church”). Together with PACOM, they form an 8-acre civic campus that has and can continue to serve as an anchor for the neighborhood. Both the PBA and Church have split FLUM and zoning designations. The northernmost 140’ of the Church property has a FLUM designation of *Light Industrial* and the remaining portion to the south is designated *Medium Density Restricted Commercial*. The property’s zoning designation is similarly split with the northern 140’ of the Church designated *Light Industrial (D1)* and the southern portion *Urban Center Zone Limited (T5-L)*. The neighboring PBA as a FLUM designation for its northern 140’ of *Light Industrial* with the southern portion designated *General Commercial*. Like its neighbor to the east, the PBA’s northern portion is also designated *Light Industrial (D1)*, while the southern portion is designated *Urban Center Zone Open (T5-O)*.

Finally, the portions of the Miami River located west of N.W. 22<sup>nd</sup> Avenue near the Property had until recently been (May 2021) been an active part of the river’s working waterfront with a FLUM and zoning designation of *Industrial* and *Waterfront Industrial District Zone (D3)*. While the site is presently inactive, it is our understanding that the site will remain part of the City’s working waterfront via its reactivation as a private marina.

- ***Recorded Restrictions & Proposed Covenant Proffer***

To the best of Applicant’s knowledge and that of its undersigned counsel, the Property is not the subject of any recorded restrictions which would impede the future redevelopment of the Property in a manner consistent with the development densities, intensities and maximum heights permitted pursuant to the FLUM and transect designations requested by Applicant. Further, Applicant does not, at this time, intend to proffer a covenant in conjunction with this Application.

### **Neighborhood Outreach**

Applicant has presented its request before the Miami River Urban Infill & Greenways Subcommittee on September 16, 2022, where it was unanimously recommended for approval with conditions by the subcommittee. We anticipate presenting before the full Miami River Commission board on October 3, 2022.

In addition, counsel and representatives of PACOM met with Horacio Stuart-Aguirre, past president, and Melanie Torrens, vice president, of the Durham Park Neighborhood Association (DPNA) to discuss the requested FLUM and rezoning. Unfortunately, we received a copy of a letter through the Miami River Commission’s staff noting the DPNA’s opposition to PACOM’s request. We look forward to further discussions with the DPNA where we hope to mitigate/address their concerns.

Finally, we have initiated conversations with neighboring stakeholders, including the First Hungarian United Church of Christ, to enlist their possible support.

### **Rationale for Change to Existing Classification & Benefit to Neighborhood**

Applicant’s request is born of the desire to reinvigorate the Community Facility Use on the Property that has been in continuous use for all but the last five (5) of the prior 70 years. Accomplishing this task requires that PACOM advance a project that will, in part, help endow the organization with

sufficient resources to secure the club's future on the Property for the next 50 years. The prior model which relied exclusively on the financial support of members of the Polish community resident in Miami alone to support the operations of the club is no longer economically viable. PACOM's goal through this request is to allow the club to benefit from the redevelopment of the site as a vehicle to re-establishing and continuing its presence on the Property in the future.

As noted above, the sub-area is stable subarea which, unlike many neighboring communities, has seen modest commercial investment in the last 30 years and has been anchored by a stable and well-maintained single-family residential home comprising the membership of the DPNA. Historic waterfront uses along the Miami River have shaped and will continue to define the character of the area. However, in the last 15 years, mixed-use development has come to exemplify the growth that has occurred within the subarea. PACOM's request is consistent with those most-recent examples located further east on the Miami River at Terrazas River Park Condominium (1861 N.W. S. River Drive) and the River Oaks Condominium (1951 N.W. 12<sup>th</sup> Street). The latter example has recently been acquired and rebranded as Pier 19 Residences & Marina and benefited from tens of millions of dollars of investments demonstrating a greater market need for such residential offerings. The Property will provide a likely complement to the future uses on the Miami River parcels, while preserving a historic Community Facility Use on the Property through the re-introduction of the club.

### **Analysis of Consistency with MNCP & Criteria in s. 7.1.2.8.f of Miami 21**

#### **1. s. 7.1.2.8.a and b, Miami 21**

In accordance with s. 7.1.2.8.a, the requested zoning change represents a successional rezoning of the Property from T5-L to T6-8-O. The Property is more than 40,000 sq. ft. in size and possesses more than 200 linear feet of Frontage along N.W. 22<sup>nd</sup> Avenue. Further, the requested rezoning change has been submitted in accordance with Miami 21's bi-annual application cycle.

#### **2. s. 7.1.2.8.c, Miami 21**

In accordance with s. 7.1.2.8.c, Miami 21, the Application includes: (i) a survey; (ii) the application forms and information required by s. 7.1.2.8.c.2; (iii) photos of the Property's immediate context; (iv) a copy of the zoning atlas indicating neighboring properties; and (v) photos of buildings within 300 feet of the Property all required by s. 7.1.2.8.c.3.g.

#### **3. s. 7.1.2.8.f, Miami 21**

##### **a. Comprehensive Plan Analysis Pursuant to s. 7.1.2.8(f)(1)(a), Miami 21**

The Application will advance a number of the Miami Comprehensive Neighborhood Plan's goals, objectives and policies including, but not limited to:

**Goal LU-1:** Maintain a land use pattern that...protects and enhances the quality of life in the City's neighborhoods...fosters redevelopment and revitalization of blighted or declining area;...promotes and facilitates economic development and growth of job opportunities in the city; [and]...promotes the efficient use of land and minimizes land use conflicts while protecting and preserving residential sections within neighborhoods...

**Analysis:** As illustrated in the enclosed photos of the surrounding area and property records, new investment in the area surrounding the Property has largely been characterized by mid-



rise, mixed-use or multi-family residential development. Presently, the commercial structures along the west side of N.W. 22<sup>nd</sup> Avenue housing marginal commercial (retail) uses whose vitality and possible reuse would be bolstered via the introduction of additional residences within the immediate area. Similarly, the low-rise multi-family residential properties abutting the Property, which provide the area with much-needed naturally occurring workforce housing, will be benefited from the proposed reinvestment as redevelopment of the Property will enhance the scope of amenities available within the neighborhood.

While the subarea is characterized by the well-maintained homes in Durham Park and the working waterfront uses along the Miami River, the recent expansion of Fern Isle Park and improvements to the PBA property, as well as the multi-family residential buildings located east of N.W. 22<sup>nd</sup> Avenue and of Durham Park, the sub-area has seen relatively little investment in the last few decades. The authorization of greater population density would help catalyze greater investment that would stall or reverse the sub-area's trend of decline or lack of investment.

Finally, the requested changes and contemplated repositioning of the Property would complement the existing character of the neighborhood because:

- (1) Redevelopment of the Property will not result in the displacement of any existing residents – the Property does not house any residential dwelling units and has been the home and has been the home of the former Community Facility use since approximately 1948 (or 74 years).
- (2) The most recent investment east of N.W. 22<sup>nd</sup> Avenue (Terrazas River Park Condominium and Pier 19) located within three blocks of the Property are designated *Urban Core Zone Restricted (T6-12-R)* and are developed in a manner consistent with Applicant's present development ambitions and its designation request in the Application.
- (3) The requested Amendments will result in a land use and zoning pattern consistent with the area's future trend, which areas are presently in transition and likely to be the subject of redesignation requests to *Urban Core Transect Zone Open (T6-8-O)* in the near future.

**Policy LU-1.1.7:** Land development regulations and policies will allow for the development and redevelopment of well-designed mixed-use neighborhoods that provide for the full range of residential, office, live/work spaces, neighborhood retail, and community facilities in a walkable area and that are amendable to a variety of transportation modes, including pedestrianism, bicycles, automobiles, and mass transit.

**Analysis:** The Property's neighborhood is anchored by the stable single-family residential neighborhood of Durham Park and the recreational amenities offered at Fern Isle Park. However, the area is devoid of the spectrum of commercial, office and community facilities uses necessary to create a vibrant neighborhood. The Applicant's requested designation change will facilitate the evolution of additional residential development that will create demand for new retail and food & beverage offerings that will serve the neighborhood. Advancement of the planned improvements will also ensure the restoration of the Polish-American Club which can serve as signature public gathering space for both residents and visitors alike.

**Policy LU-1.2.1:** The City defines blighted neighborhoods as areas characterized by the prevalence of older structures with major deficiencies and deterioration, high residential vacancies and widespread abandonment of property, litter and poor maintenance of real property. Declining neighborhoods are defined in areas characterized by the prevalence of structures having minor deficiencies, a general need for improvements in real property, significant declines in real property values, high vacancy rates in commercial structures and increasing difficulty in obtaining insurance. Neighborhoods threatened with decline are defined as areas characterized by significant but infrequent property maintenance neglect, an aging housing stock, declining property values, general exodus of traditional residents and influx of lower income households.

**Analysis:** The subarea immediately within 300 feet of the Property is comprised of thirteen (13) folios (excluding the Property) consisting of the following uses: (i) two (2) parcels with Community Facility uses; (ii) three (3) parcels with multi-family residential use; (iii) three (3) parcels with commercial (retail) use; and (iv) five (5) parcels with waterfront industrial uses. Only two (2) of the 13 parcels has seen substantial investment this century, the balance have been without such notable investment for the past 40 years. The below chart summarizes the area conditions:

Parcel Address	Folio No.	Use	Year Built	Invest. Year
2300 NW 14 ST	01-3134-076-0010	Community Facility	1967	2017
2250 NW 14 ST	01-3134-006-0010	Community Facility	1952	1969
1310 NW 22 AV	01-3134-072-0010	Multi-Family Res.	1967	1967
1340 NW 22 AV	01-3134-066-0010	Multi-Family Res.	1968	1968
1360 NW 22 AV	01-3134-070-0010	Multi-Family Res.	1961	1961
2210 NW 14 ST	01-3134-092-0010	Commercial	1979	1979
2222 NW 14 ST	01-3134-062-0010	Commercial	1947	1947
2215 NW 14 ST	01-3134-000-0160	Waterfront Indust.	1942	1959
2277 NW 14 ST	01-3134-073-0010	Waterfront Indust.	1941	1975
2295 NW 14 ST	01-3134-057-0010	Waterfront Indust.	1958	2006
1480 NW 22 CT	01-3134-054-0010	Waterfront Indust.	1956	1956
2199 NW S River DR	01-3134-095-0010	Waterfront Indust.	1973	1973
1101 NW 22 AV	01-3134-075-0010	Commercial	1968	1968

While the adjoining properties are stable, approval of the Application would likely spur additional investment that will affirmatively forestall the prospect of neighborhood decline. As evidenced from the above chart, 85% of the parcels within the subarea have had minimal investment. Finally, while the subarea has not experienced a decline in

property values, the proposed change will ensure that such a negative trend never takes hold.

**Objective LU-1.3:** The City will continue to encourage commercial, office and industrial development within existing commercial, office and industrial areas; increase the utilization and enhance the physical character and appearance of existing buildings; encourage the development of well-designed, mixed-use neighborhoods that provide for a variety of uses within a walkable area in accordance with neighborhood design and development standards adopted as a result of the amendments to the City's land development regulations and other initiatives; and concentrate new commercial and industrial activity in areas where the capacity of existing public facilities can meet or exceed the minimum standards for Levels of Service (LOS) adopted in the Capital Improvements Element.

**Analysis:** As noted above, the requested map amendment will stimulate new investment in the neighborhood. The Application will result in the approval of a designation for the Property that will allow for the development of a well-designed, mixed-use project that will complement the area's long-standing waterfront industrial character.

**Policy LU-13.15:** The City will continue to encourage a development pattern that enhances existing neighborhoods by developing a balance mix of uses, including areas for employment, shopping, housing, and recreation in close proximity to each other.

**Analysis:** Approval of the requested amendments will support the reinvestment in a stable neighborhood that has been devoid of substantial investment with few exceptions and can benefit from the activation of the Property in a manner that will introduce neighborhood-serving commercial uses, as well as housing, community facilities (like PACOM), and expand access to the Miami River and its tributaries.

**Objective PR-1.1:** The City shall work to achieve a medium-term objective of providing a park within a ten-minute walk of every resident.

**Objective PR-1.4:** Expand existing and create new greenways and trails to meet resident needs.

**Objective PR-3.2:** Enhance the public's visual and physical access to waterfront areas.

**Policy PR-8.1.2:** The City will support cultural and heritage programs and facilities in selected areas of the City such as, but not restricted to, Overtown, the Design District, and Little Havana, including small performing arts venues, heritage trails, street fairs, and similar programs, through land development regulations and other strategies.

**Analysis:** As noted hereinabove, the Property is situated on the Comfort Canal across from Fern Isle Park and immediately east of the park's extension near the PBA. It is located within a two-minute walk of the park's main entrance on N.W. 22<sup>nd</sup> Avenue. Further, redevelopment of the Property will also result in the construction of a riverwalk segment that will expand physical and visual access to this portion of the riverfront, provide area

residents a recreational amenity on the canal, and create the opportunity for a direct linear connection from N.W. 22<sup>nd</sup> Avenue to northern sections of Fern Isle Park across both the Property and Church parcels. Approval of the Application will result in the City's use of its land development regulations to support the re-establishment of a cultural facility long associated with the Property.

**Objective CM-2.1:** Wherever feasible, increase, physical and visual public access to Biscayne Bay, the Miami River, the City's shorelines, and publicly-owned islands.

**Policy CM-2.1.3:** The City will continue development of the river walk and bay walk along City-owned property as funds become available and will continue to require development of the bay walk and river walk along private property through its land development regulations.

**Analysis:** The Applicant intends to accommodate the development of a river walk along the southern edge of the Property along the Comfort Canal. Such an improvement will provide the public and future residents of the Property with visual and physical access to the riverfront and preserve the prospect of a future connection across the Church to the northern portion of Fern Isle Park..

**b. Need & Practical Justification for Rezoning in accordance with s. 7.1.2.8.f.1.b, Miami 21.**

As evidenced by the photos accompanying this Application documenting conditions within 300' of the Property, there are signs of neighborhood's need for additional investment due to aging housing stock and limited neighborhood-serving retail uses. Capital investment by the private sector is necessary to reverse the current conditions. Approval of the Application will result in the first meaningful capital investment along this portion of the N.W. 22<sup>nd</sup> Avenue corridor in decades. The notable lack of residential density in the area also complicates the prospect for future redevelopment of this portion of the corridor into a mixed-use subdistrict. Approval of the Application will introduce needed density to support a mix of uses and help restore a historic, cultural use on the site.

**c. Goals of Miami 21 Preserved in Accordance with s. 7.1.2.8.f.2, Miami 21.**

The proposed rezoning will render the Property's designations consistent with the principal goals of Miami 21 and the City's subdivision regulations. Approval of the Application will support several of Miami 21's conservation and development goals, including: (i) the preservation of neighborhoods; (ii) increasing access to the natural environment through the riverwalk; (iii) rebuilding the City's commercial Corridors to function as Mixed-Use, transit-oriented, walkable centers for adjacent Residential Neighborhoods; and (iv) establishing a rational process for successional growth in areas identified for density and growth.

**Conclusion**

The Application will serve to restore a historic, Cultural Facility use through the approval of a FLUM and zoning transect designation that will permit the Property to be redeveloped in a manner that will secure the future financial welfare of the club through the incorporation of residential and office uses. Approval of the Applicant's request will also serve to complement the historic, working waterfront character of the subarea and improve the future prospect of neighboring commercial (retail) uses at the intersection of N.W. 22<sup>nd</sup> Ave & 11<sup>th</sup> Street with the addition of the requested residential density.



We greatly appreciate your staff's assistance with this Application and look forward to presenting the request to both the Planning, Zoning & Appeals Board and City Commission.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Javier E. Fernández, Esq.  
For the Firm

Enclosure(s)

Cc: David Snow, Assistant Director, Planning Department  
Jacqueline Ellis, Chief of Land Development, Planning Department  
Sue Trone, Chief of Comprehensive Planning, Planning Department

EXHIBIT "A"

TABLE SUMMARY OF REQUESTED FLUM & ZONING CHANGES

Folio No.	Address	Lot Size (sq. ft.)	Existing FLUM	Proposed FLUM	Current Zoning	Proposed Zoning
01-3134-042-0020	1250 N.W. 22 <sup>nd</sup> Ave	80,256	Med. Density Rest. Commercial	Restricted Commercial	T5-L	T6-8-O