INTRODUCTION

Miami Beach is one of the youngest municipalities in the United States, as it was not incorporated as a city until shortly before 1920. Its growth since 1920 has been phenominal, and is still continuing at an extraordinary rate. The rapid increase in population has been accompanied by a building development surpassed by only a few metropolitan cities and, despite unsettled conditions throughout the world, there is, as yet, little indication of a decline of this activity here.

Such rapid growth is always a mixed blessing. It produces serious problems in municipal administration. The large number of hotels and multiple dwellings concentrated within a comparatively small area accommodates thousands of people during the winter season. The resultant concentration of traffic causes congestion that is becoming more and more difficult to handle. The limited street space is not only called upon to carry moving traffic, but, because of limited off-street parking facilities, must also serve as storage space for parked vehicles. As more apartments and hotels are built, the problem will become more aggravated.

Building development in Miami Beach falls into two distinct categories. The first type consists of speculative hotel and apartment house construction; the second, single-family homes for permanent or seasonal residents. The former

type of building is concentrated in several well defined, relatively small areas, chiefly along and near the ocean front. Due to the fact that present zoning regulations permit the practice, many speculative builders are over-crowding the land. Such short-sighted policies will make many of these areas less and less desirable and will soon create blighted districts within which property values will no longer maintain their present level.

Land use problems in Miami Beach are somewhat different from those encountered by other cities, but the end result of uncontrolled speculative building will be the same. Its peculiar geographical location makes outward expansion virtually impossible, in contrast to other cities, which are rapidly decentralizing and losing population at the centers. This spreading out produces areas of declining property values and depreciated buildings in the older parts of the city, and is a thoroughly destructive process. Decentralization cannot take place in Miami Beach under present conditions but, if the present trend of land over-crowding continues, living conditions will no longer be attractive to visitors. Instead of local decentralization, more desirable resort centers elsewhere will develop to such an extent that the future prosperity of this city will be impaired.

Miami Beach has enjoyed some of the benefits of zoning since 1930, at which time the city had a permanent

population of less than 7,000. The zoning ordinance has been invaluable in protecting the extensive residential areas from encroachment by business and multiple dwellings, but has not been effective in controlling population density and open spaces about buildings, particularly in the multiple-family districts.

In order to produce a well-balanced urban structure, there must be a comprehensive plan to coordinate the more important physical improvements of the city. Consideration must be given to the proper relationships between streets, schools, recreational areas, transportation facilities and the like. Land uses must be related to the requirements of present and future population, so arranged as to bring about the most economical and efficient arrangement possible. As a first step in the formulation of such a plan, exhaustive studies have been made of present land uses and population density and distribution in Miami Beach, the results of which are incorporated in this report.

LEGAL BASIS FOR ZONING

Chapter 9837 of the Laws of Florida grants zoning powers to the City of Miami Beach. Section 3 of this act reads as follows:

"Such regulations shall be made in accordance with a comprehensive plan and designed to lessen congestion in streets; to secure safety from fire, panic and other dangers; to promote health and general welfare; to provide adequate light and air; to prevent the overcrowding of land; to avoid undue concentration of population; to facilitate the adequate provision of transportation, water, sewerage, schools, parks and other public requirements. Such regulations shall be made with reasonable consideration, among other things, as to the character of the district and its peculiar suitability for particular uses, and with a view to conserving the value of buildings, and encourage the use of the most appropriate land throughout such municipality."

It will be noted from the above language that the zoning regulations must be made in accordance with a comprehensive plan; i. e., the pattern of the city as a complete unit must be the dominant consideration. Community interest precedes that of the individual. The character of each district, as part of the comprehensive plan, must be considered. An accurate knowledge of existing conditions is indispensable. The phrase, "with a view to conserving the value of buildings", is of particular significance, implying as it does that the purpose of zoning is not to encourage speculation in land, but rather to protect investments already made in buildings. The zoning plan now proposed and which accompanies this report has been drawn in accordance with these provisions of the law.

EXISTING LAND USES

The Land Use Survey

Sound zoning depends on an accurate and complete knowledge of total building, both in the city as a whole and also by districts or sections, throughout the entire city. Such information should show present conditions and trends in such a manner as to facilitate determination of future trends and needs. This is a particularly important prerequisite to the preparation of a sound and stable ordinance. A zoning ordinance and plan should be so prepared as to preclude the necessity for frequent change. Only in this way can growth be directed into channels of stability and order.

The first step in the Miami Beach land use Survey was to indicate on the city block maps all existing property uses from records of the Building Department. These block maps were then taken into the field and the uses shown were checked for accuracy, lot by lot. After completion of the field check, all of the land use data were transferred to a city map, the various property uses being indicated by different colors. The following different land uses were shown on the map.

One-Family Dwellings

Two-Family Dwellings

Multiple-Family Dwellings

Hotels

Commercial Uses

Light Industry

Heavy Industry

Public and Semi-Public Property (including institutions, churches, schools, golf courses, and the like)

Parks and Playgrounds

Computations were made of the area occupied by each of these different uses, and also of the area in streets and alleys, in vacant property and in water areas. These computations were made both for the city as a whole and were further broken down into some seventeen (17) selected statistical districts into which the city was divided. These seventeen (17) areas were selected because of their more or less homgeneous character, within each of which property development and population characteristics were generally similar. The districts were also used as a basis for making studies of poulation growth.

General Characteristics of Land Uses

Table Number 1 is a summary of the land use characteristics of the entire city area of Miami Beach. Total areas in use for each of the various classifications are shown, and the percentage of each, computed separately on the basis of total city area and on the basis of total developed area (i.e., total city area less vacant land, water and outlying islands). Comparisons are made with similar percentages of land uses in a group of other cities for which such statistics are available.

Table Number 1

USE CLASSIFICATION OF CITY AREA

Use	(1) Area in Acres	(2) % of Total City Area Miami B.	(3) % of Total City Area Average in 16 Cities	(4) % of Total City Area Average in 6 Suburban Cities	(5) % of Total Developed Area in Miami B.	(6) % of Total Developed Area Average in 16 Cities	(7) % of Total Developed Area Aver. in 6 Suburban Cities
Single-Fam.Res.	904.04	21.30	21.80	25.90	31.00	36.10	44.51
Two-Fam.Res.	12.19	.29	1.29	1.12	.42	2.10	1.95
Multiple Dwell.	191.02	4.50	.69	.89	6.53	1.09	1.71
Hotels	99.82	2.24			3.42		
Commercial	136.57	3.27	1.44	.85	4.67	2.38	1.43
Light Industrial	19.16	.45	1.99		.65	3.21	
Heavy Industrial	12.05	.28	4.84 (1)	6.30 (2)	.41	7.58(1)	10.30
Public - Semi-P.	566.21	13.30	4.49	5.32	19.35	7.61	9.13
Parks - Playg.	92.18	2.16	3.98	.72	3.15	6.33	1.26
Streets - Alleys	889.02	20.85	20.20	16.80	30.40	33.60	29.71
Tot.Devel.Area	2,922.26				100.00	100.00	100.00
Vacant Land	1,336.03	31.36	39.28	42.10			
Total	4,258.29	100.00	100.00	100.00			
Outlying Islands	686.68 (3)						
Water	8,127.32						
Total Area Incorporation	13,072.29						

Notes: (1) Includes Heavy Industry and Railroad Property.
(2) Includes Light and Heavy Industry and Railroad Property.
(3) Includes Fisher Island, Flagler Memorial, Virginia Key and miscellaneous islands along Channel. All vacant except 19.65 acres classed as Public and Semi-Public, 6.20 acres classed as Heavy Industrial and 1.26 acres Single-Family.

The total area within the corporate limits of Miami Beach is 13,072 acres, of which more than 8,100 acres are waterways, canals, and the waters of Biscayne Bay, while 686 acres are contained in the outlying islands, such as Fisher Island and Virginia Key. In computing the percentage occupancy of the various uses, the water and outlying island areas have been excluded from the total city area.

As shown by the table, single-family residential development is the predominant land use in Miami Beach. 31 per cent of the total developed area is devoted to such purposes. For comparison between cities, a truer picture is gained if the variable factor of vacant land is excluded from the total area. This is slightly less than the average city, which is 36.1 per cent for self-contained cities, and 44.5 per cent for suburban cities. The percentage of land occupied by two-family residences is quite low in Miami Beach, there being but 12 acres devoted to such use. Multiple dwellings occupy 191 acres, or 6.53 per cent of the total developed area. Hotels occupy 99.8 acres, or 3.4 per cent, making the total percentage occupied by multiple dwellings and hotels combined approximately 10 per cent. This is very much higher than the average city, and indicates that the construction of multiple dwellings and hotels plays a very important part in the building development of Miami Beach. Compared to other cities, the area occupied by commerce is also relatively high

(4.7 per cent of the developed area, as compared to 2.4 per cent for the average self-contained city). There is comparatively little industrial development in Miami Beach, the total percentage being 1 per cent, compared to more than 11 per cent in self-contained cities and 10 per cent in suburban cities. It should be noted in passing that the combined area occupied by multiple, dwellings and hotels corresponds generally to that utilized by industry in other cities, and that the area occupied by industrial uses in Miami Beach corresponds generally to the area occupied by multiple dwellings and hotels in other cities. Multiple dwellings and hotels, therefore, might be considered Miami Beach's industry.

Public and semi-public uses occupy 566 acres and constitute 19 per cent of the developed area in Miami Beach. This is somewhat more than the average city, due primarily to the fact that there are several large privately owned golf courses within the corporate limits of the city, whereas in most other municipalities such uses are generally located beyond the corporate limits. The acreage of parks and playgrounds is somewhat below the average. Streets and alleys constitute about 30 per cent of the developed area, both in Miami Beach and in the average city.

Examination of the land use map shows that hotels and apartment houses are concentrated in several well-defined areas. With the exception of a relatively small section in the northern part of the city, the ocean front has been built up

and is rapidly developing with hotels varying in size from small 30-room buildings to those containing several hundred rooms. A few of the earlier large hotels are located on the bay side of the city, but in recent years most of the construction has been concentrated within two to three blocks of the ocean side. Apartment house development is found chiefly within the area below Lincoln Road and in the section adjacent to Collins Avenue from Twenty-Third to Forty-Fourth Streets. There is also a scattering of apartments in the Sixty Third Street area on Normandy Isle and in a few other locations.

While there are a few single-family residences south of Fifteenth Street, the great majority of them are located on the various islands and in that part of Miami Beach north of Lincoln Road and west of Collins Canal. Due to the fact that the original developers of Miami Beach were careful to restrict the areas developed with homes, and the Miami Beach zoning ordinance was adopted relatively early in the life of the city, the single-family areas are quite homogeneous and free from obnoxious non-conforming uses so often found in similar areas in other cities.

There are several well-established commercial districts, the largest and principal one being along Washington Avenue and adjacent streets south of Fifteenth. The Lincoln Road commercial center is a compact area developed with high-class retail businesses, and is one of the most attractive commercial streets in any city. There is a relatively small

commercial development along Collins Avenue near Twenty-Third Street, and other centers have developed in the vicinity of Seventy-First and Collins, along Forty-First Street, and on Normandy Isle.

Industrial uses are concentrated at the lower end of the city and along the bay south of Sunset Isles.

The principal undeveloped sections of the city are in the northern part, although there are a great many vacant lots scattered throughout the other sections.

Discussion of Various Land Uses

1. Single-Family Residences. At the time of the survey it was found that 3,025 single-family residences occupied a total area of 904 acres in Miami Beach. It is interesting to note that in several of the seventeen statistical districts building development is exclusively single-family in character. Several others are predominantly so.

2. Two-Family Residences. Two-family residences are comparatively rare in Miami Beach, there being only 108 of these buildings in the entire city. They are practically all located south of Fifteenth Street in Districts Numbers 1 and 3. Although many cities permit two-family residences in any district, the original Miami Beach zoning ordinance prohibited them in single-family districts, and because of this regulation they have not scattered themselves indiscriminately throughout the city.

3. Multiple Dwellings. This type of use constitutes one of the outstanding problems in the zoning of Miami Beach. They are essentially speculative in character, and, because of the large number of people attracted to Miami Beach in the winter time and residing there temporarily, there has been a great deal of activity in recent years in this type of dwelling construction. There are a total of 829 multiple dwelling buildings, which contain 8,801 dwelling units. In addition to these multiple dwellings or apartment houses, there are also approximately 300 rooming houses, most of which have been converted from single-family residences. More than half of the multiple dwellings are located south of Fifteenth Street, and the great majority of the rooming houses are found in this area. There are also a large number of apartments in District Number 6, located along Collins Avenue between Twenty-third and Forty-fourth Streets. A somewhat scattered development has taken place in the area between Sixty-Third and Seventy-first, and in the area north of Surfside Park. Intensive apartment house and hotel development in the extreme northerly part of the city will produce an unbalanced growth in the city and should be discouraged by changes in the zoning ordinance. Specific recommendations will be found in a later section of the report.

4. Hotels The large number of hotels built in Miami Beach in recent years has become an outstanding characteristic of the city. This type of construction is frequently

more speculative than multiple dwellings. There is a growing tendency on the part of many hotel builders to crowd the land to its utmost capacity. This is not true of all hotels for many have ample light and air and open space about the structure. Under the present zoning regulations, hotels are permitted in all multiple-family districts, with the result that, while the majority of them are concentrated along the ocean front and in areas adjacent thereto, quite a few are found throughout the multiple-family dwelling districts. There is a pronounced scattering of these uses in the northern part of the city, such as was found in the case of apartment houses. One of the greatest weaknesses of the present ordinance is lack of density of population regulations and inadequate open space requirements for hotels and multiple dwellings. The poor standards of some hotel and apartment construction is due to this deficiency in the zoning ordinance. Those who observe good standards of construction are thus penalized by those who do not and hence there is less and less incentive for good standards of open space. If all are required to observe good minimum standards the quality and the value of each and all will be improved.

5. Commerce. As stated previously, Miami Beach has more area devoted to commerce than the average city. This is undoubtedly due to the fact that, being a resort city, the scale of commercial development is determined by the peak

population which occurs during a few months in the winter. Further examination of the retail business development shows this even more clearly. There is a total of 48,802 lineal feet of commercial frontage in Miami Beach, which is an average of 180.9 lineal feet per 100 permanent residents. The average city has a similar ratio of only 63.7 lineal feet per 100, so that it is apparent that a true understanding cannot be obtained on any basis other than peak population. Estimating a total peak population during the winter of 70,000. persons, it was found that the lineal feet of commerce to 100 people were 69.7, which was slightly higher than the average city. (See Table Number 2.) In making these computations, U. S. Census figures for 1940 were used for permanent population, and the peak population figure of 70,000 was calculated from the number of dwelling units available and the estimated number of persons occupying each type of dwelling unit at a given time. The latter figures correspond generally with those used by the Chamber of Commerce.

6. Industrial. There is comparatively little industrial development in Miami Beach, and practically no obnoxious uses such as are found in many cities. Those industries which are located here consist principally of oil and gasoline storage, boat repair and supply yards, and miscellaneous small industries such as bakeries, laundries, and the like. The control of industrial development is not an important zoning problem in Miami Beach.

Table Number 2.

EXISTING COMMERCIAL DEVELOPMENT

			Acres
1.	Area occupied by commercial use		136.57
	A. Percentage of total developed area		4.67
	B. Percentage of total city area		3.27
2.	Number of units	1340	
3.	Total lineal feet of commercial frontage	48,802	
4.	Average frontage per store		36.4
5.	Average commercial frontage of entire City per 100 persons residing permanently in Miami Beach		180.9
6.	Average commercial frontage of entire city per 100 persons at peak of season		69.7
	Average in 16 cities		63.7

Note: Permanent population estimated at 27,000.

Population at peak of season estimated at 70,000.

7. Public and Semi-Public Property and Parks.

These two combined uses constitute a very considerable part of the city's area, and the open spaces they provide are invaluable to the well being of the inhabitants of Miami Beach. As time goes on, there will probably be a tendency to subdivide the privately owned golf courses and develop them with homes. This points out the importance of providing additional public open spaces in the form of parks and recreational areas as opportunities arise and funds permit.

Analysis of Existing Aapartment Houses

As part of the land use survey, a complete list of apartment houses was compiled, showing the year built, the number of dwelling units provided for in the building, the area of the lot, the area of the building, the percentage of lot occupancy, and the number of square feet of lot area per dwelling unit in the building. In determining proper density regulations for multiple dwellings, none of which are contained in the present ordinance, this data was invaluable. Table Number 3 is a summary of the analysis made in this study. Of the 694 apartment house buildings, 121 provided lot areas between 1,500 and 2,000 square feet per family; 135 provided from 1,000 to 1,500 square feet per family; 169 provided from 600 to1,000 square feet per family; and 121 provided from 400 to 600 square feet per family. It is thus seen that the density of population varies widely, but that the predominant density falls between 600 and 1,500 square feet per family.

Table Number 3.

ANALYSIS OF EXISTING APARTMENT HOUSES

Lot Area Per Dwelling Unit (Square Feet)	Number of Buildings	% Total	Number of Units	% Total	Total Area Occupied (Acres)	% Total
Over 3000	8	1.15	48	.54	3.89	2.60
2000-2999	47	6.77	258	2.92	14.15	9.45
1500-1999	121	17.44	607	6.87	23.42	15.65
1000-1499	135	19.45	1152	13.04	32.73	21.87
600-999	169	24.35	1887	21.36	34.80	23.25
400-599	121	17.44	2089	23.64	24.03	16.05
Under 399	93	13.40	2794	31.63	16.66	11.13
Totals	694	100.00	8835	100.00	149.68	100.00

Floor Area Per Dwelling Unit (Square Feet)	Number of Buildings	% Total
Over 1200	48	6.92
800-1199	181	26.08
600-799	241	34.73
400-599	188	27.08
200-399	36	5.19
Totals	694	100.00

Table Number 4

ANALYSIS OF EXISTING HOTELS

Lot Area Per Room (Square Feet)	No. of Bldgs.	% Total	No. of Rooms	% Total	Total Area Occupied (Acres)	% Total
1000-1500	5	1.95	435	2.75	4.78	5.33
600-999	6	2.33	171	1.08	2.55	2.84
400-599	23	8.95	1328	8.41	14.34	15.99
300-399	33	12.84	1948	12.34	14.72	16.41
200-299	88	34.25	5182	32.82	29.88	33.32
100-199	96	37.35	6279	39.76	22.62	25.23
Under 99	6	2.33	448	2.84	.79	.88
Totals	257	100.00	15791	100.00	89.68	100.00

Floor Area Per Room	No. of Bldgs.	% Total
800-1200	4	1.56
600-799	19	7.39
400-599	54	21.01
300-399	122	47.47
200-299	48	18.68
Under 199	10	3.89
Totals	257	100.00

Table Number 5

TREND OF POPULATION DENSITY IN APARTMENT HOUSES

Year	Number Built	Average Lot Area Per Dwelling Unit
Prior to 1930	211	770
1930	25	1474
1931	15	1449
1932	4	1615
1933	8	1411
1934	28	1198
1935	76	1179
1936	112	1174
1937	78	1120
1938	60	1229
1939	74	1087
Total	691 Average	1246

Table Number 7

AMOUNT OF LAND USED AND ZONED - MY USE

MIAMI BEACH

Use	Area in Use (Acres)	Area Now Zoned (Acres)
Single-Family Residence	904.04	1,026.75
Parks and Playgrounds	92.18	
Public and Semi-Public	566.21	
Two-Family Residence	12.19	13.37
Multiple-Family Residence	191.04	950.14
Hotels	99.62	
Commercial	136.57	269.90
Light Industrial	19.16	41.98
Heavy Industrial	22.05	44.33
Streets, Alleys and Other Unzoned Property	889.04	913.82 (1)
Vacant	1,336.01	
	4,258.29	4,256.22

(1) Includes Lummus Park which is unzoned.

The table also shows the floor area of the dwelling unit, the predominant classification being from 600 to 800 square feet per dwelling unit.

A similar analysis was made of the existing hotels, as shown in Table Number 4. Of 257 buildings, 184 provided lot areas between 200 and 300 square feet per guest room 67 provided more than 300 square feet per guest room, while only 6 had less than 100. On the basis of floor area per room, the predominant classification fell between 300 and 400 square feet. In order to determine the recent trend in density of population provided in hotels and apartment houses, a study by years was made of all such buildings erected. It was found that 211 buildings were built prior to 1930, during which year the zoning ordinance was established, and that the average lot area per dwelling unit was 770 square feet for these buildings. The newer buildings have generally provided much more adequate open spaces, the average for whole city since 1930 being 1,246 square feet per family. In recent years, there has been an increasing tendency to crowd the land. This trend is very apparent from examination of the figures. Beginning in 1934, construction of apartment houses began at an accelerated rate, and the density of population per building increased progressively from that time on. For example, in 1939, when 74 buildings were erected, the average lot area per dwelling unit was 1,087, compared to 1,474 square feet in 1930. This trend indicates the importance of immediately

introducing adequate density regulations in the zoning ordinance.

Table Number 6 shows the results of similar studies conducted for hotels. Many of the early hotels in Miami Beach, such as the Flamingo, Floridian and Nautilus, generally had spacious grounds and low density. Those built since 1930, however, have been composed largely of smaller buildings located on small lots. There is a slightly discernible tendency toward providing less density in recent years, as indicated by the building records of 1939, in which year the 47 hotels built provided 256 square feet of lot area per room.

Analysis of Present Zoned Areas

Table Number 7 shows the total area used for various purposes, together with the total area zoned for such purposes in the zoning ordinance adopted in 1930 and now in effect. There are 2,026 acres zoned for single-family residence, of which 904 acres are presently occupied by single-family residences. Inasmuch as public and semi-public property and parks and playgrounds are generally found in the single-family areas, the area occupied by these uses, added to that occupied by single-family residences, makes a total area in actual use of 1,562 acres. This indicates that there is ample room for expansion of single-family residences in Miami Beach.

The area zoned for two-family residences corresponds quite generally to that actually used for that purpose, but,

Table Number 6.

TREND OF LOT AREA PER ROOM IN HOTELS

Year	Number Built		Average Lot Area Per Room (Square Feet)
Prior to 1930	87		276
1930	3		232
1931	1		140
1932	1		158
1933	3		202
1934	10		227
1935	21		235
1936	38		242
1937	24		224
1938	19		249
1939	47		256
Total	254	Average	222

as stated before, there are very few two-family residences and it hardly seems necessary to provide a separate district for this type of development.

The area zoned for multiple-family and hotel use is 950 acres, whereas that actually used for those purposes is only 290 acres. There is evidently an excessive amountof area zoned to permit multiple-family dwellings and hotels. Perhaps wrongly Zoned This condition is particularly apparent in the northern part of the city, where a large area is set aside for such uses, but the predominant use is for single-family residences and a few small apartment houses. Over-zoning for multiple-family uses is an obstacle to the balanced development of the city and, by lending itself to speculative enterprises, retards home development. While it is important that enough multiple-family dwelling districts be provided to take care of future needs and to provide reasonable choices of location, care should be exercised to keep these areas within bounds. The new ordinance proposes to reallocate such districts in accordance with actual needs.

Future expansion of commercial enterprises is adequately provided for, as shown by the 270 acres zoned for such purposes, and the 136 acres actually used. Provision of excessive commercial zoning has been a characteristic of many ordinances throughout the united states, and has produced many unfortunate conditions. The above figures indicate that

commercial zoning in Miami Beach is generous, but there is no serious excess, as is so often found in other cities.

The amount of industrial zoning, compared with that actually in use, is reasonable and does not constitute a serious problem here.

BUILDING TRENDS SINCE 1930

In a city which is growing as rapidly as Miami Beach, and whose area of expansion is strictly limited, it is most important to know how much area has been absorbed in the past by different types of buildings in various parts of the city, so that a trend may be established as an indication of what may be expected in the future. Studies were made in each of the seventeen statistical districts to find out how much land had been absorbed for different uses in the past ten years. As the amount of vacant land now existing in each of these districts was a known quantity, it was possible to estimate the length of time required to absorb these vacant areas, assuming the continuation of past trends. From these figures it was also possible to determine the areas needed for various uses.

Table Number 8 is a summary of these findings. During the past ten years a total of 724 acres has been utilized by new buildings. 67.8 per cent was taken up by single-family residences; 14.3 per cent by apartments; 5.9 per cent by hotels; 9.3 per centby commerce, and the rest by two-family residences, industrial uses andpublic and semi-public uses. Here again is indicated the importance of single-family development in Miami Beach, even though a great deal of emphasis is laid on apartment house and hotel construction.

Table Number 8.

AREAS ABSORBED BY NEW BUILDINGS 1930-1939 INCLUSIVE - BY DISTRICTS.

District Number	One Family (Acres)	Two Family (Acres)	Apmt. (Acres)	Hotels (Acres)	Comm. (Acres)	Ind. (Acres)	P & S-P (Acres)	Vacant (Acres)	Total (Acres)
1	3.76	1.86	9.12	4.64	10.20	-	.43		30.01
2	1.36		13.90	16.10	27.80	-	.86		60.02
3	34.40	2.58	36.00	1.84	2.84	-	.58		78.24
4	6.20	-	6.02	.78	13.50	.34	.35		27.19
5	1.38	-	2.75	6.29	.98	1.23	.43		13.06
6	4.10	.16	6.65	11.70	1.88	-	-		24.49
7	54.20	1.15	.88	-	-	-	.34		56.57
8	33.70	-	-	-	-	-	-		33.70
9	45.20	.25	1.20	-	.23	-	3.70		50.58
10	83.50	.46	1.41	-	3.43	-	.35		89.15
11	32.40	-	-	-	.17	-	-		32.57
12	78.60	-	-	-	-	-	-		78.60
13	8.50	.40	13.50	1.05	2.10	-	.74		26.29
14	22.30	.51	3.70	-	.88	-	.97		28.36
15	18.35	1.98	3.70	.38	1.18	-	-		25.59
16	25.50	-	.40	-	2.07	-	-		27.97
17	38.00	-	3.85	-	-	-	-		41.85
Total	491.45	9.35	103.08	42.78	67.26	1.57	8.75		724.24
Per Cent	67.80	1.30	14.30	5.90	9.30	.20	1.20		100.00

There is a total of 4,656 vacant lots in the City of Miami Beach together with unsubdivided property, which will provide 794 additional lots or a total of 5,450 vacant tracts. There is a total of 2,477 vacant lots which are restricted to single-family use. During the past ten years, an average of 192 single-family dwellings have been built annually. Assuming this trend will continue in the future, all single-family lots will have been absorbed in a little less than thirteen years.

There is a total of 2,432 vacant lots now zoned to permit multiple dwellings and hotels. During the past ten years, an average of 67.3 such buildings have been constructed. Assuming a continuation of past trends, the multiple-family dwelling lots will not be completely built up for 36 years. Expressed another way, at the end of thirteen years, when all single-family lots have been built on, there will still remain 1,544 vacant multiple-dwelling building sites.

upon which multiple dwellings may be built.

There are 541 vacant lots now zoned for commerce. An average of 23.7 commercial structures have been built annually in the past ten years. If this trend continues, it will take 23 years to utilize all of the commercial lots.

The above figures indicate that the present multiple-family zoning is excessive and out of scale with future requirements. A readjustment of such districts, as proposed in the ordinance will result in a much better balanced plan.

CITY OF

MIAMI BEACH

FLORIDA

ZONING COMMISSION

BISCAYNE BAY

ATLANTIC OCEAN

LOCATION OF NEW BUILDINGS

1938 - 1939

L E G E N D

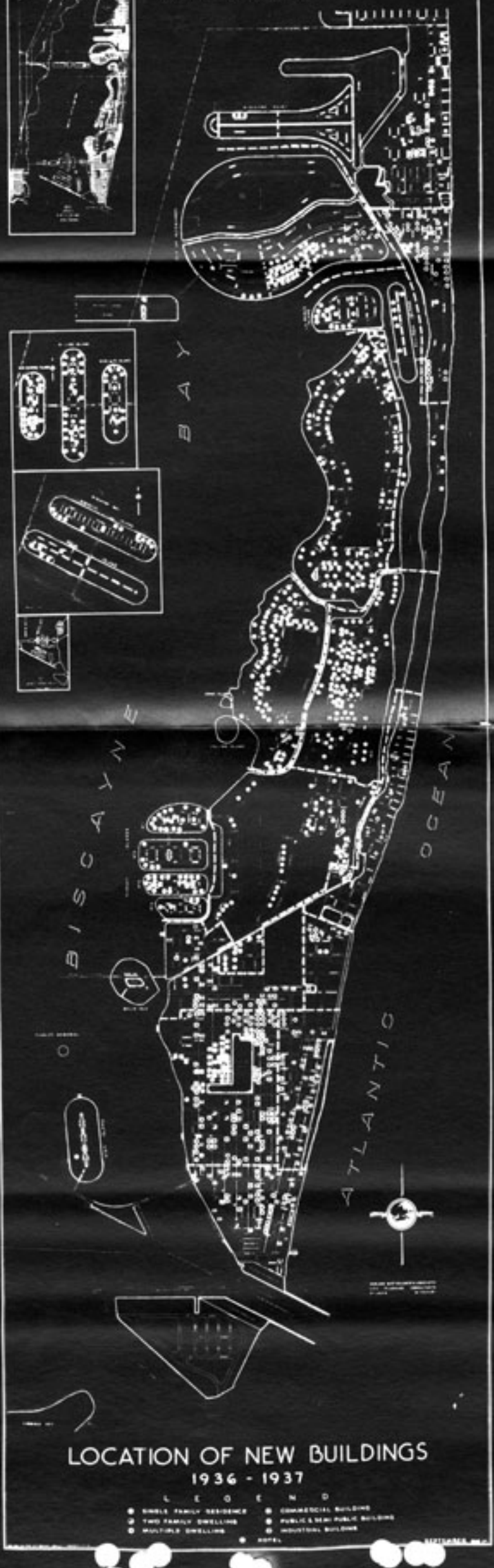
- SINGLE FAMILY RESIDENCE
- TWO FAMILY DWELLING
- MULTIPLE DWELLING
- COMMERCIAL BUILDING
- PUBLIC & SEMI PUBLIC BUILDING
- INDUSTRIAL BUILDING
- HOTEL

CITY OF

MIAMI BEACH

FLORIDA

ZONING COMMISSION



LOCATION OF NEW BUILDINGS

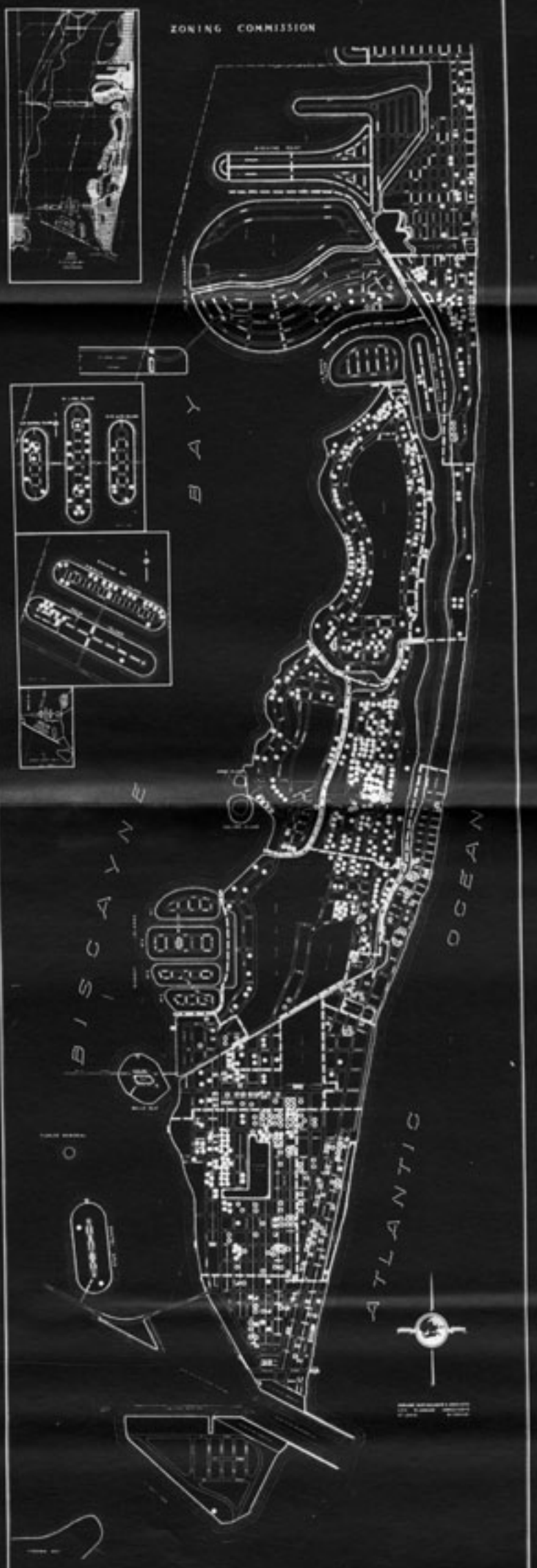
1936 - 1937

L E G E N D

- SINGLE FAMILY RESIDENCE
- TWO FAMILY DWELLING
- MULTIPLE DWELLING
- COMMERCIAL BUILDING
- PUBLIC & SEMI PUBLIC BUILDING
- INDUSTRIAL BUILDING
- HOTEL

CITY OF MIAMI BEACH FLORIDA

ZONING COMMISSION



LOCATION OF NEW BUILDINGS

1934 - 1935

L E G E N D

- SINGLE FAMILY RESIDENCE
- TWO FAMILY DWELLING
- MULTIPLE DWELLING
- HOTEL
- COMMERCIAL BUILDING
- PUBLIC & SEMI-PUBLIC BUILDING
- INDUSTRIAL BUILDING

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BAY

BISCAYNE

OCEAN

ATLANTIC

LOCATION OF NEW BUILDINGS

1932 - 1933

L E G E N D

- SINGLE FAMILY RESIDENCE
- TWO FAMILY DWELLING
- MULTIPLE DWELLING
- COMMERCIAL BUILDING
- PUBLIC & SEMI-PUBLIC BUILDING
- INDUSTRIAL BUILDING
- HOTEL

CITY OF

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LOCATION OF NEW BUILDINGS

1930 - 1931

L E G E N D

- SINGLE FAMILY RESIDENCE
- TWO FAMILY DWELLING
- MULTIPLE DWELLING
- COMMERCIAL BUILDING
- PUBLIC AND PUBLIC BUILDING
- INDUSTRIAL BUILDING
- HOTEL

Table Number 9 shows the number of new buildings erectedby districts since 1930 as a check on the information included under Table Number 8. It will be noticed that the percentages are generally comparable for each type of use.

Location of New Buildings

The rapid growth of Miami Beach between the years 1930 and 1940 is shown by the census figures for population increase during that period and is emphasized by a review of the volume of building done. As shown by Table Number 9, there were 2,861 new buildings constructed. These structures had a value of $66,393,000, a very impressive figure, considering the size of Miami Beach, and that during the years 1931 to 1933 the country experienced a history-making depression. Since 1935, new building operations have averaged approximately $10,000,000 per year and to date, in 1940, this pace is being maintained.

Building statistics have more significance from a zoning standpoint when they are analyzed on the basis of type and location in the City. A series of drawings has been prepared, showing the location of every new building constructed during each biennial period since 1930, classified according to type. These drawings (Plates Number 1 to 5 inclusive) present a graphic picture of building development during this period and, when compared with the zoning district map, show clearly the extent to which these regulations have directed the growth of the city.

Table Number 9.

NEW BUILDINGS ERECTED 1930-1939 INCLUSIVE - BY DISTRICTS

District Number	One Family	Two Family	Apts.	Hotels	Comm.	Ind.	P.SS-P.	Total
1	25	10	52	28	42	-	2	159
2	8	-	58	70	43	-	1	180
3	187	13	183	6	14	1	1	405
4	32	-	29	3	65	2	2	133
5	6	-	8	16	4	1	1	36
6	14	1	32	31	8	-	-	86
7	201	4	5	-	-	1	1	212
8	88	-	-	-	-	-	-	88
9	197	2	5	-	2	3	3	212
10	311	1	6	-	30	-	-	348
11	61	61	-	-	1	-	-	62
12	293	-	-	-	-	-	-	293
13	46	3	46	5	14	2	2	118
14	137	3	16	-	8	2	2	168
15	99	11	23	1	.5	-	-	139
16	59	-	1	-	1	-	-	61
17	160	-	1	-	-	-	-	161
Total	1924	48	465	160	237	12	15	2861
Per Cent	67.4	1.7	16.2	5.5	8.3	.4	.5	100.00

1930 and 1931, single-family dwellings were constructed in all parts of the city south of Sixty-Third Street. None were built on what is now Biscayne Point and Normandy Isle. Apartment house construction was limited almost entirely to the area south of Lincoln Road and few hotels were built. There was considerable commercial activity along Fifth Street and on Washington Avenue.

1932 and 1933 were characterized by a sharp curtailment of building construction, particularly of the speculative type. Few apartments, hotels and commercial establishments were built, the predominating activity being in the single-family field.

In 1934 and 1935, construction of new hotels was the most significant building activity. They were principally located along the ocean front south of Lincoln Road, but quite a number were built in the area between Twenty-sixth and Thirty-Fifth Streets. The spread northward of multiple family dwellings was another characteristic of this period. Several were built in the vicinity of Sixty-Ninth and Collins and on Normandy Isle. Single-family construction continued at an even pace and was located principally in the area between Twenty-Eighth and Sixty-Third Streets.

The period 1936 and 1937 was marked by a cessation of single-family construction south of Eleventh Street and a continued activity in multiple-family and hotel construction

in all parts of the City zoned to permit such uses.

Many new hotels were constructed in 1938 and 1939, particularly along Collins Avenue and adjacent streets between Fifteenth and Twenty-Second. Sunset and Normandy Islands became active in single-family dwelling construction, as did most other parts of the city.

POPULATION CHARACTERISTICS AND TRENDS

Present Population

The population of Miami Beach has increased more rapidly than any city in the United States. Between 1920 and 1930 the percentage increase was 908.4 and between 1930 and 1940 it amounted to 321.0. The 1940 permanent population has been announced by the Census Bureau as 27,340, compared to 6,494 in 1930.

From a City Planning and Zoning standpoint, the peak winter population is of more importance than the year-around permanent population. The life of the city is geared to the winter season; hotels, apartments and retail commerce are built primarily for this trade; parking and traffic problems reach their maximum seriousness between January and March and the provision of municipal services is at its peak during that time of the year.

While accurate information on the number of people that are in Miami Beach at any one time is unavailable, it is possible to approximate this figure by determining the number of dwelling units of different types and arriving at an estimate of the average number of persons occupying each type of dwelling unit. Table Number 13 shows that the total 1940 peak population is 70,039, if Chamber of Commerce figures for population per dwelling unit are used. Census Bureau figures are somewhat lower, but as their averages are based

on permanent population data, it is thought the Chamber of Commerce estimates more nearly represent actual winter conditions.

Changes in Population

An Analysis was also made of the changes in population by districts between 1930 and 1940. Plate Number 6 shows graphically the 1930 population in various parts of the city, compared with the 1940 population. The most substantial numerical increases have taken place in the area comprising Districts Number 1, 2 and 3, lying generally to the south of 16th Street. It is in this part of the city that much of the intensive apartment house and hotel construction has taken place. In District Number 6, which is also a multiple-family and hotel area, a very substantial growth has taken place since 1930. All other sections have shown varying increases. This steady growth in every part of the city is in contrast to the experience of many older and larger municipalities. In practically all of these cities, population has left the central areas and migrated to the suburbs. Miami Beach is not beset by the problems of excessive decentralization, but it is threatened with an equally serious condition of land overcrowding. If continued indefinitely, blighted districts will be created, property values will be depreciated and the city will be faced with a declining taxable assessment and loss of revenue.

Table Number 10.

POPULATION POSSIBLE UNDER PRESENT BUILDING TRENDS
AND
AREAS ZONED

Class of District	Area Square Feet	No. of Units.	Population
Hotel	11,527,050	45,028 (Rooms)	67,542
Multiple Dwelling	29,310,760	26,884	80,652
Two-Family	582,560	117	468
Single-Family	67,507,130	8,496	42,480
	108,927,500	80,525	191,142

Note: Existing density regulations, or in their absence, prevailing 1939 density trends were used in these calculations. 256 square feet of lot area per hotel room and 1087 square feet of lot area per multiple dwelling unit were used. Population per unit from Table Number 8-(b).

CITY OF

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FLORIDA

ZONING COMMISSION

DENSITY OF POPULATION
BY DISTRICTS
1930

L E G E N D

CITY OF

MIAMI BEACH

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ZONING COMMISSION

INCREASE IN POPULATION

BY DISTRICTS

1930 - 1940

CITY OF

MIAMI BEACH

FLORIDA

ZONING COMMISSION

DENSITY OF POPULATION

BY DISTRICTS

1940

L E G E N D

CITY OF

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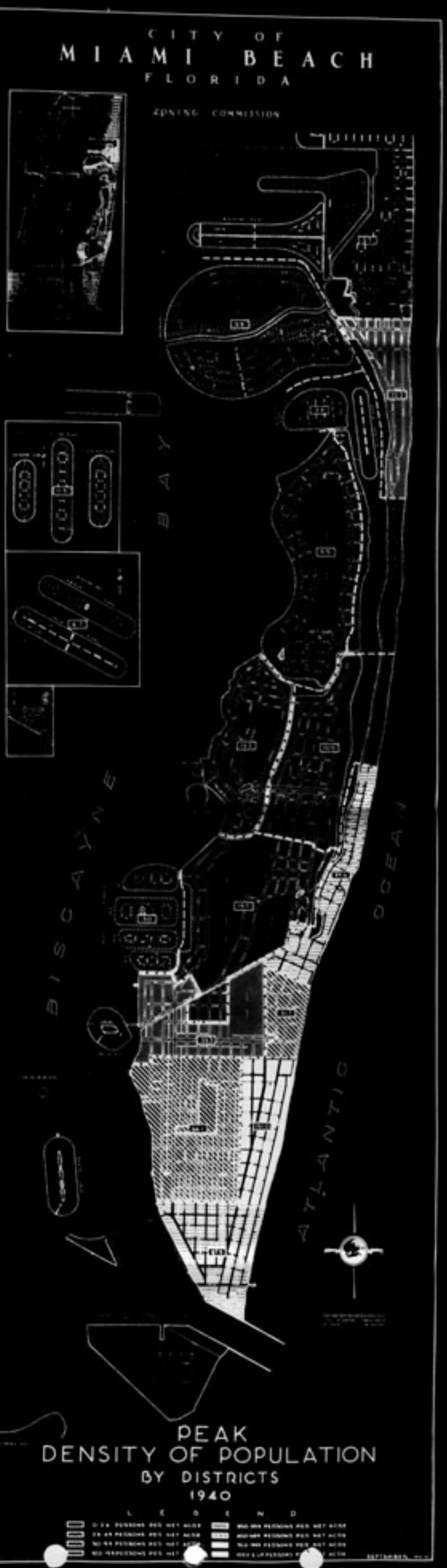

PEAK
DENSITY OF POPULATION
BY DISTRICTS
1940

L E G E N D

Population Density

Plates Number 7, 8 and 9 show graphically the density of population in various parts of the city in 1930 and in 1940. Density is expressed in terms of persons per net acre (gross a rea less streets and alleys and permanent open spaces).

It will be seen that in 1930, with a permanent population of 6,494, there was a uniformly low density of population in all sections of the city. With the exception of District Number 1, which contained 11.8 persons per net acre, no area had a density of more than ten persons per acre. Had figures been available for peak winter population during that year, higher densities would have been revealed.

The very substantial increase in population between 1930 and 1940 resultedin a material change in population densities throughout the city. The maximum density now occurs in District Number 2 (See Plate Number 8) where it is 55.5 persons per net acre. This is a relatively high figure and compares to that found in the more crowded section of much larger cities. For example, in 1930, only a few districts in St. Louis had densities of more than 60 persons per acre. Los Angeles has almost no such density.

Density of permanent population does not present a true picture of conditions in Miami Beach at certain times of the year, however. Plate Number 9, which shows the density of p opulation occuring during the peak of the winter season

Table Number 11.

POPULATION BY DISTRICTS - 1930 and 1940

(PERMANENT)

District	1930 Population	Net Area	Population Per Net Acre	1940 Population	Pop.Per Net Acre.
1	1398	118.22	11.8	4119	34.8
2	1754	91.13	9.4	5069	55.5
3	690	209.46	3.3	5910	28.2
4	250	105.80	2.4	1850	7.5
5	100	54.08	1.8	687	12.8
6	150	87.20	1.7	1319	15.2
7	690	163.58	4.2	1217	7.4
8	-	99.06	-	150	1.5
9	197	188.71	1.0	888	4.7
10	286	239.88	1.2	1977	8.2
11	50	156.16	0.3	350	2.2
12	470	206.31	2.3	1126	5.4
13	100	109.50	0.9	278	2.5
14	100	268.88	0.4	600	2.2
15	70	347.71	0.2	447	1.3
16	100	137.04	0.7	297	2.1
17	133	116.11	1.1	1041	8.9
Total	6,538			27,355	

of 1940, is very revealing. Here it is seen that in District Number 2 the density is 151 persons per net acre and indicates a crowding of land and population unsurpassed by few American cities, regardless of size. Such a concentration of population is somewhat less serious in Miami Beach because of the very favorable weather conditions and the temporary nature of the crowded condition. It is indicative, however, of a trend, that if continued will lead to eventual collapse of the established values because of a public reaction against living in such crowded quarters.

Relative high densities are also found in Districts Number 1, 3 and 6, but in all other sections of the city the spaciousness of the development is reflected in the relatively few people per acre. Again it must be emphasized that the city must obtain more adequate control over the speculative land developer and require him to adhere to decent standards of open space and population density.

Table Number 12

POPULATION DENSITY BY DISTRICTS AT PEAK OF SEASON - 1940

District	Population	Gross Area	Pop.Per Gross Acre	Block Area	Pop.Per Bl.Acre	Net Area	Pop. Per Net Acre.
1	10,363	202.83	51.2	145.26	71.3	118.22	87.5
2	13,749	172.95	79.7	124.63	110.5	91.13	151.0
3	13,927	344.47	40.1	247.40	56.0	209.46	66.1
4	3,519	277.02	15.5	168.77	20.9	105.80	33.3
5	2,795	112.33	25.1	54.08	51.7	54.08	51.7
6	7,792	137.70	56.8	97.13	80.6	87.20	89.6
7	2,526	424.18	5.9	361.59	7.0	163.58	15.7
8	505	122.35	4.1	99.77	5.0	99.06	5.0
9	2,485	254.03	9.8	196.43	12.6	188.71	13.2
10	2,515	314.63	8.0	243.25	10.3	239.86	10.5
11	610	195.56	3.1	162.57	3.8	156.16	3.9
12	1,970	420.49	4.7	346.91	5.7	206.31	9.5
13	2,440	142.35	17.2	113.12	21.5	109.50	22.2
14	1,568	477.26	3.3	390.24	4.0	268.88	5.9
15	1,282	416.77	3.0	352.23	3.6	347.71	3.7
16	649	174.24	3.7	141.31	4.6	137.04	4.7
17	1,340	156.48	8.6	124.58	10.8	116.11	11.5
Total	70,335						

Block Area - Gross Area lessStreets and Alleys

Net Area - Gross Area less Area Devoted to Streets, Alleys, Parks, Playgrounds, Heavy Industry, and Public and Semi-Public Uses.

THE PROPOSED ORDINANCE

District Maps

The proposed ordinance retains the present method of having a separate Use District Map and an Area District Map. For maximum clarity and administrative simplicity it is generally desirable to combine all districts on one map. In Miami Beach, however, it was found inadvisable to do so because of the fact that the area districts in the present ordinance were so numerous and were related so closely with deeded restrictions that a departure from established custom would not be practicable. The new ordinance, therefore, consists of one map, showing combined Use, Height and Density of Population Districts, and another map showing Area Districts.

Use, Height and Density of Polulation Districts.

The present ordinance divides the city into seventeen (17) classes of Use districts, consisting of four estate districts, one single-family district, one two-family district, two multiple-family districts and nine businessdistricts. The proposed ordinance eliminates or combines three of the present districts and adds one new district, making a total of fourteen.

It was deemed advisable to eliminate the "RDD" Modified Single-Family District (two-family) as it covered a very small area and prevailing development was such that a multiple-family classification seemed more logical. The "BAAA"

Table Number 13.

RESIDENTIAL ACCOMMODATIONS AVAILABLE IN 1939

(a)

Type	No. of Living Units	Estimated Population Per Unit	Total Pop.	% City Total
Single Family	3025	3.75	11344	18.74
Two Family	216	3.20	691	1.14
Apartments	8835	2.37	20939	34.60
Rooming Houses	300	8.00	2400	3.97
Hotels	16763	1.50	25145	41.55
Totals	29139		60519	100.00

(b)

Single Family	3025	5.00	15125	21.60
Two Family	216	4.00	864	1.23
Apartments	8835	3.00	26505	37.84
Rooming Houses	300	8.00	2400	3.43
Hotels	16763	1.50	25145	35.90
Totals	29139		70039	100.00

Note: Estimated Population per dwelling in (a) from census bureau averages; in (b) from Chamber of Commerce estimates. Complete occupancy is assumed.

was
Business District likewise eliminated as it was very restricted in size and the uses permitted in the next lower classification did not seem inappropriate for the locality. The present "BB" and "BC" Business Districts were combined in a new "BB" District, the present "BE" and "BF" Business Districts were combined in a new "I" Industrial District and the present "BD" Business District was changed to an "I" Light Industrial District. Part of the area now zoned "RE" was placed in a new district designated the "RH" Hotel District.

There are no height regulations in the present ordinance and no density regulations for multiple dwellings. Without such regulations, the ordinance is not comprehensive and it is highly important that they be includedin the new legislation.

Changes in District Boundary Lines

(a) Estate Districts. The "RAA", "RA", "RB" and "RC" Estate District boundary lines of the old ordinance are virtually unchanged. One area on West Avenue between 10th and 14th Streets is recommended to be changed to an "RH" Hotel District.

(b) Single-Family District. The most substantial changes recommended in respect to the "RD" Single-Family District has to do with the inclusion in this district of a relatively large area on Normandy Isle and in the area north of Surfside Park, now zoned for multiple dwellings. This section of the city is largely undeveloped and that which has taken

place to date is almost exclusively single-family. To encourage the development of a large multiple-family area in that location would be unsound as it would lead to impairment of values in the presently developed apartment house areas and would make it impossible to develop the area for its logical use as a single-family district.

(c) Two-Family District. As stated previously, the very small area now zoned to permit two-family dwellings has been eliminated.

(d) Four-Family District. The present "RDE" Restricted Multiple-Family District, which permits four-family dwellings, is limited to a very few small areas. This type of district is very valuable in a city like Miami Beach, as it offers opportunities for the small investor and the type of buildings built under its provisions does not result in a densely populated and crowded district. It is recommended that certain areas now in the "RE" classfication be changed to four-family. The principal recommended areas are located at the eastern end of Normandy Isle, along Abbott and Harding, north of Seventy-third Street and in the vicinity of Sixty-Ninth and Carlyle. Other smaller areas are located in various parts of the city.

(e) Multiple-Family District. The present ordinance includes 950 acres of the city's area in an "RE" or Multiple-Family Dwelling District in which hotels are also permitted. There are no regulations relating to the height

of buildings or to the density of population. It is within these areas that most of the speculative building has taken place. Not only should there be adequate minimum standards set to insure provision of light and air and to prevent excessive "sweating" of the land, but the present area zoned for multiple dwellings should be adjusted more to scale with present and future needs. As previously stated, there is a large excessof apartment house zoning in the northern part of the city. This excessive multiple dwelling zoning is conducive to speculative hotel and apartment house construction, which, if continued in the future will inevitably result in lossof value to other sections of the city where substantial investments have already been made. The southern section of the city is better suited for multiple dwelling development than any other area. It is already established there, and has ample room for expansion for many years. It should be encouraged and given the greatest possible protection by the general zoning plan.

(f) Hotel District. It is also proposed to create a new type of district in the area now zoned "RE" which would be called the "RH" Hotel District. This district embraces the area along the ocean front, now intensively developed by hotels. It includes all of the present "RE" district east of Washington Avenue and south of Twenty-third Street, the "RE" district along Collins Avenue from Twenty-Sixth to Forty-Fourth, the bay-front north of Sixth Street to Sixteenth Street and certain other smaller areas. While hotels can still be erected in the new "RE" district, they are limited to three stories in height. In the "RH" districts the height limit is one hundred and fifty (150) feet of fourteen (14) stories, which corresponds to that proposed in the pending building code.

(g) Business Districts. Careful studiesof commercial zoning in the present ordinance and its relationship to present and future demand indicate clearly that there is ample commercial frontage set aside to meet any future need. Of 269.9 acres zoned for commerce, 136.57 acres are in actual use. There are 91,482 lineal feet zoned and 48,802 lineal feet in use. On the basis of 69.7 lineal feet of commerce now provided for every 100 persons of peak winter population, the present zoned commercial frontage is sufficient to serve a future population of approximately 131,000 persons. Inasmuch as the estimated total population that will be accommodated in Miami Beach when all vacant land is absorbed is 124,000, it is evident that the total frontage is more than ample and needs no expansion.

A study was also made to determine whether the individual commercial districts were adequate to serve future needs, as it is obvious that certain of them might be deficient while others might be over-generous in zoned frontage. For the purpose of this analysis, the city's seventeen (17) statistical districts were combined in such a manner as to divide the city into areas adjacent to the principal commercial centers. Within these areas the zoned and used commercial frontage was determined and a ratio between present peak population and used commercial frontage established. From previous estimates of eventual population made for each of the seventeen (17) districts,the ultimate frontage needed was

determined by applying the ratio. In only two commercial areas was a deficiency found.

In considering the boundaries of commercial districts for the proposed ordinance, certain adjustments were deemed advisable in the light of conditions revealed by the Land Use Survey and the study outlined above. In the southern part of the city, where the most extensive commercial development has taken place, it was found that the present business zoning was far out of scale with any possible need. It was also found that on certain streets, such as Alton Road between Sixth and Eleventh and on Lenox Avenue between Fifteenth and the alley south of Lincoln Road, one side of the street was in a commercial classification and the opposite frontage was zoned for multiple dwellings. This kind of zoning is legally difficult to sustain, particularly if the frontage which is zoned for businesshas not developed that way. Consequently, the proposed ordinance eliminates the commercial zoning on these streets. Also in this general area it was found that the commercial zoning of the north half of the blocks south of Sixth Street, between Alton Road and Euclid Avenue, could not be justified either from the standpoint of need or because of prevailing development. The proposed ordinance reclassifies this area for multiple-family use.

Another area proposed to be changed from its present commercial classification is located on the south side of

Table Number Two

PRESENT AND PROPOSED COMMERCIAL ZONING BY DISTRICTS

District	Frontage Now Zoned For Commerce	Frontage Now Used For Commerce	1940 Peak Population	Feet Used Commercial Frontage Per 100 Pop.	Feet Zoned for Commercial Per 100 Pop.	Estimated Peak Population 1960	Commercial Frontage Needed-1960 on Basis 1940 Ratio	Comm. Front Provided In Proposed Ordinance
Area South of Dade and 21st Street	60,215	37,835	44,353	85.3	135.9	56,624	50,547	56,982
23rd and Collins Area	10,695	4,811	10,318	46.6	103.6	15,484	7,231	10,694
41st Street Area	4,502	2,184	5,000	43.7	90.0	7,725	3,380	4,852
71st and Collins Area	6,479	1,823	5,020	36.4	129.1	14,130	5,150	3,584
Biscayne Point	5,334	592	1,282	46.0	416.1	15,219	7,010	5,334
Normandy Isle	4,258	857	1,568 (1)	31.5	276.1	9,089 (2)	2,865	3,058
Totals	91,483	48,102	67,541	69.7	130.6	122,285	76,183	84,504
Palm and Hibiscus Islands		700						
		48,802						

(1) Total 1940 Population Including Palm, Belle, Sunset and Hibiscus Islands - 70,037

(2) Total Estimated 1960 Population Including Palm, Belle, Sunset and Hibiscus Islands - 124,037

Fifteenth Street between Washington and Drexel Avenues. This is a minor extension of the Espanola Way commercial district and is so small that it falls under the category of "spot zoning".

The only other change in commercial zoning of any consequence is the frontage on Collins Avenue from Sixty-Ninth Street to a point south of 67th Street and between 24th and 30th Streets, including the ocean front. There is an excessive amount of commercial zoning in these areas and the frontage so zoned has not developed in that manner. To partially compensate for the frontage removed from the commercial classification and to encourage a more compact development in the Seventy-First Street neighborhood, it is proposed to change the block on Harding Avenue between Seventy-First and Seventy-Second from an "RE" classification to commercial. It is proposed to change the present BAAA zoning on Collins and the ocean front between 24th and 30th to an RH Hotel District. Very little commercial development has occurred in this area and prevention of any future expansion is important in order to prevent further traffic congestion on Collins Avenue and to protect Pancoast Lake and the ocean front from commercial exploitation.

Any change from commercial to residential is suggested for the Flamingo Hotel property on Bay Road.

It is also proposed to extend the commercial zoning on the south side of Lincoln Road from Washington Avenue to the west line of James Avenue extended. Inasmuch as the other three corners at the intersection are zoned to permit commerce such a change seems logical.

Further extension of commercial zoning eastward on Lincoln Road is not advisable as there is ample commercial zoning in the area to supply present and future needs. If unanticipated demand should devlop it would be better to provide additional commercial frontage on Washington Avenue south of Lincoln Road other than extending eastward on Lincoln. Commercial development at the intersection of Collins Avenue and Lincoln

Table Number 15

EXISTING AND PROBABLE LAND USE AREAS AND RECOMMENDED ZONED AREAS

Use	(1) Area Now Occupied In Acres	(2) Acres Per 100 Persons Permanent Pop. 1940	(3) Acres Per 100 Persons At Peak Pop. 1940	(4) Acres Per 100 Persons Averg. City	(5) Future Occupied Area Based on Ratios of Column 3	(6) Area of Recommended Zoning Districts	(7) Area of Present Zoning Districts
Single-Family Res.	904.04	3.345	1.292	2.935	1600.00	2421.14	2026.75
Parks and Playgrounds	92.18	.341	.131	.479	161.00	-	-
Public and Semi-Public	566.21	2.095	.810	.622	654.00	-	-
Two-Family Residence	12.19	.045	.017	.143	21.50	-	13.37
Multiple-Family Res.	191.02	.709	.274	.076	340.00	407.19	950.14
Hotels	99.82	.370	.143	-	177.00	240.55	-
Commercial	136.57	.506	.196	.179	243.00	233.99	269.90
Light Industrial	19.16	.071	.027	.236	33.50	24.50	41.98
Heavy Industrial	12.05	.047	.017	.680	21.10	41.90	42.33
Streets, Alleys	889.02	3.290	1.270	2.820	950.00	889.02	913.82
Total	2922.26	10,819	4,177	8.170	4151.10	4258.29	4258.22
Vacant Land	1336.03				57.19		
Total City Area	4258.29				4258.29		

Permanent 1940 Population - 27,000

Peak 1940 Population Estimated - 70,000

Eventual Population Estimated - 124,000

Road would result in adding further congestion to an over-crowded street and would be the opening wedge to the eventual commercialization of Collins Avenue both north and south of Lincoln.

The above described changes are the principal used involving commercial property. Table Number 14 is a summary, by principal business areas, of the estimated requirements for future commerce and the proposed amount of zoned commercial frontage to satisfy these future needs. It will be noted that, within practical limits, the theoretical frontage needed has been provided. It is obviously impossible to precisely predict future needs in Miami Beach, but unquestionably the proposed zoning is generally to scale. The net results of the proposed chnages in commercial zoning has been to reduce the present 91,483 lineal feet of frontage to 84,504 lineal feet, which compares with 48,802 lineal feet in actual present use and 76,183 lineal feet estimated to be needed when the city is fully built up.

(h) Industrial Districts. Other than consolidation of the present "BE", and "BP" and "BG" Business Districts into one Industrial District, few changes are proposed in these classifications. It is recommended that the frontage on the north side of Twentieth Street west of Alton be placed in a light industrial classification to afford a greater measure of protection to the adjoining residential property on Sunset Island Number 4. It is also recommended that the government owned property on either side of the Government Cut be removed from the Unrestricted classification and placed in the "I" Industrial District, and that the Surfside Park property recently acquired by the city be changed to a residential classification. The only unrestricted area recommended is on Virginia Key.

Area of Proposed Zoning Districts

Previous studies have indicated that if the building trends established during the past ten years are continued in the future, all vacant land within the present corporate limits of Miami Beach will have been absorbed in about twenty years, at which time there will be dwelling accommodations for approximately 124,000 persons.

As shown in Table Number 1, the land use characteristics of Miami Beach are generally similar to those of other cities with certain noted exceptions. In this table the areas used for different purposes were shown as percentages of the total area of the city. In order to determine future area requirements for different land uses and to establish a sound basis for establishing zoning districts, the areas now used for the different land uses were reduced to acres per 100 persons. These ratios were determined for both permanent and peak 1940 population and are set forth in Table Number 15. By the use of these ratios it is possible to determine how much area will be required for each land use for any given future population. Assuming an eventual peak population of 124,000, an estimate of future requirements can be obtained. Table Number 15 shows these estimated future requirements and makes a comparison between them and the total area proposed to be zoned for each land use classification. In all cases, the ratio of acres used to 100 persons of peak population is used, rather than permanent population.

The very compact development of Miami Beach is shown by the total acreage of various uses needed by each 100 persons. There is a total of 4.177 acres compared to 8.17 acres in the average city. With the exception of acres used for multiple dwellings, hotels, public and semi-public uses, and commerce, all other uses require much less area than is found in other cities.

These ratios applied to the estimated future population of 124,000 indicate that 4151 acres of land will be needed for all uses. As the total land area of the city is 4258 acres, it will be almost entirely utilized and little or no vacant land will remain.

Zoning must be related to present and future land use requirements; otherwise, it will be unbalanced, out of scale and of doubtful legality. The areas included within the proposed zoning districts are shown in Table Number 15 in order to compare the recommended areas with estimated requirements.

It will be noted that 2421 acres are included in the single-family districts, compared to 904 acres in actual present use and 1600 acres estimated to be eventually needed. This apparent disparity occurs because of the large acreage of parks, playgrounds, and public and semi-public property, most of which is located in single-family districts. When these facts are taken into account, it is seen that there is

Table Numb er 16.

AREA IN ACRES USED AND PRO POSED ZONING - BY DISTRICTS

Dist. No.	Single-Family Area Used	Single-Family Area Zoned	Two-Family Area Used	Two-Family Area Zoned	Four-Family Area Used	Four-Family Area Zoned	Multiple-Family Area Used	Multiple-Family Area Zoned	Hotel Area Used	Hotel Area Zoned	Commercial Area Used	Commercial Area Zoned	Commercial Frontage Used	Commercial Frontage Zoned	L. Industrial Area Used	L. Industrial Area Zoned	H. Industrial Area Used	H. Industrial Area Zoned	Public and Semi-P Area Used	Parks and Playgs. Area Used
1	7.28	-	4.82			-	.92	40.80	14.06	3.92	34.61	62.00	12,133	22,309	4.43	12.80	4.28	30.43	18.30	4.46
2	6.77	-	.33			-	.16	27.00	23.14	52.70	25.47	25.68	10,814	9,833	.81	-	-	-	8.64	24.66
3	54.49	42.10	3.78			-	.83	148.00	13.74	40.40	5.06	22.60	2,272	5,020	1.10	-	-	-	2.15	35.79
4	24 .90	91.10	.18			-	.17	34.00	1.41	1.13	27.98	41.80	10,942	17,593	5.69	11.70	2.83	-	59,67	.47
5	14.99	-	-			-	.61	-	6.86	50.25	6.63	5.82	1,464	2,227	.43	-	-	-	-	-
6	7.92	8.92	.28			-	.48	5.60	21.16	56.55	18.64	28.90	4,811	9,512	-	-	-	-	1.15	8.78
7	115.94	350.00	-			-	.72	3.30	2.75	-	-	2.75	-	1,182	-	-	-	-	198.01	-
8	42.11	100.20	-			5.00	-	-	-	-	-	-	-	-	-	-	-	-	-	.71
9	93.41	165.10	.38			10.90	2.16	-	10.06	18.75	3.09	3.54	531	1,476	-	-	-	-	2.72	5.00
10	148.41	230.96	.44			-	5.10	4.87	.51	-	4.22	7.72	1,653	3,376	.52	-	-	-	3.23	.14
11	70.55	163.10	-			-	-	5.95	-	-	-	-	-	-	-	-	-	-	6.41	-
12	117.84	345.00	-			-	-	-	-	-	.37	-	110	-	-	-	-	-	139.14	1.46
13	10.42	33.70	.28			18.00	16.56	39.90	5.04	16.85	5.84	13.62	1,713	3,584	-	-	-	-	2.72	.90
14	29.60	344.00	.55			26.50	5.69	-	.50	-	1.19	8.43	857	3,058	-	-	-	-	121.18	.18
15	26.51	309.54	.93			30.50	4.83	-	.59	-	1.05	11.13	592	5,334	-	-	-	-	1.03	3.49
16	70.57	131.12	.22			-	.28	-	-	-	2.07	-	700	-	-	-	-	-	1.66	2.41
17	62.35	106.00	-			-	3.51	6.87	-	-	.35	-	210	-	6.18	-	4.94	11.47	-	3.53
Total	904.04	2421.14	12.19			90.90	191.02	316.29	99.82	240.55	136.57	233.99	48,802	84,504	19.16	24.50	12.05	41.90	566.21	92.18

"RDD" District Eliminated in Proposed Ordinance.

4-Family Apartments not Separated from Multiple-Family Dwellings.

actually very little difference in the two figures. The area proposed to be zoned for multiple-family and hotel uses is somewhat in excess of estimated requirements in order to permit a reasonable choice of location.

It will be noted that the area recommended to be zoned for commerce and light industry is slightly less than the estimated requirements. However, the total area to be zoned for commerce and light and heavy industry is slightly in excess of that estimated to be needed. Inasmuch as commerce is permitted in industrial districts and there is a substantial amount located in those areas at present, the proposed commercial and industrial zoning is not unduly restrictive.

In estimating the future requirements for streets and alleys, it was necessary to disregard the ratio of area to future populations as most of Miami Beach is now subdivided and the vacant property is largely located in such areas. As streets and alleys are not zoned, the figure shown in the table represents the area now actually used for those purposes.

In order to show the relationship between the proposed zoning and the areas actually used in different parts of the city, Table Number 16 was prepared. This shows by statistical districts the areas in present use and the area proposed to be zoned for such uses.

Building Trends and Absorption of Vacant Land. An analysis of building trends during the past ten years revealed that the present ordinance did not provide the proper balance

between single-family and multiple-family dwelling districts. As shown on page 20, all of the single-family vacant lots will have been built upon long before the vacant multiple-dwelling lots have been absorbed. The proposed ordinance is much better balanced in this respect.

There are 3852 vacant lots zoned for single-family residence. Assuming that building operations continue at the same rate as in the past ten years, these lots will have been fully built up in about twenty years. The 1219 vacant lots remaining in the proposed multiple-dwelling and hotel districts will be fully utilized in approximately eighteen years and the 373 vacant lots zoned for commercial purposes will be absorbed in about sixteen years.

Area Districts

There are now thirty-seven (37) Area Districts provided in the Miami Beach Zoning Ordinance. As stated previously, it was deemed inadvisable to attempt to reduce these to correspond to the number of Use, Height and Density Districts, and very few changes are recommended in the Area District Boundaries.

Textual Provisions.

Definitions. These were completely revised to eliminate some ambiguity and to make them conform to new subject matter introduced into the proposed ordinance. All definitions were closely coordinated with those included in the pending building code in order to avoid conflict.

Enactment Clause. Revised for purposes of simplification of text.

Estate Districts. Present permitted uses were augmented by inclusion of certain types of public recreational uses and buildings. Regulations for accessory uses and buildings were drawn in considerable detail.

A height limit of two and one-half stories or thirty-five feet was recommended in the absence of similar regulations in the present ordinance.

No changes were recommended in the lot area per family requirement of the present ordinance.

"RD" Single-Family District. Present permitted uses were unchanged.

A height limit of two and one-half stories or thirty-five feet was recommended.

The Lot area per family requirements of the present ordinance were unchanged.

"RDE" Restricted Multiple-Family Dwelling District. The principle changes proposed in the uses permitted in this district have to do with "bungalow courts". In the proposed ordinance, no mention is made of this type of housing, either in definitions or in the district regulations. The buildings comprising what is generally known as a "bungalow or house Court" are essentially single-family dwellings. Therefore, they should be erected on a lot as defined in the ordinnance and should comply with the density and open space requirements for single-family dwellings. It is recommended that churches be permitted inthe "RDE" Districts. They are

not mentioned in the present ordinance, but, being a natural part of a residential development, should be permitted in such areas. The proposed lot area per family provisions of the "RDE" District are as follows:

Single Family Residences	2,800 Square Feet
Two-Family Residences	1,600 Square feet
Multiple-Family Residences	1,250 Square feet

The 2,800 square feet requirement for single-family residences corresponds to the present requirement for bungalow courts. The density requirements for other types of dwellings are new. They will permit the erection of a four-family building on a lot containing 5,000 square feet, or two duplexes on a lot containing 6,400 square feet.

Height requirements are the same as those in the single-family and estate districts.

One new and highly important regulation proposed in the new ordinance has to do with providing off-street parking facilities by all new multiple-dwellings. The proposed regulations provide that such off-street parking must be supplied on the premises in the ratio of one space for each two dwelling units. A four-family dwelling thus would be required to have a two-car garage either in the building, in a separate building, or to have an open area on the property of equivalent size.

"RE" Multiple-Family Districts. As described previously, the proposed "RE" District in the new ordinance is

primarily an apartment house area in which hotels are permitted. There is, however, a three-story height limit and hotels may not conduct an accessory business of any kind. The provision of the present ordinance, permitting hotels of one hundred room s or more to contain business uses, has been eliminated.

Miniture golf courses are permitted in the present ordinance but, as these uses are commercial in character, it was deemed advisable to limit them to commercial and industrial districts.

The question of public and private schools was given careful consideration and, for legal reasons, it seemed necessary to permit both types in the "RE" Districts. Schools other than public schools are limited to those having curricula the same as ordinarily given in public schools. This provision will eliminate the possibility of establishing such commercial uses such as barber colleges, dancing schools and the like.

The provision for off-street parking in the "RE" District requires hotels to provide such facilities in the ratio of space for one car for each four guest rooms. Multiple dwellings must supply space at the ratio of one car to each two dwelling units. In the event such parking areas are not provided on the same property occupied by the apartment or hotel, they may be located elsewhere after the location and design has been approved by the City Council. Provisions-

are also made in the proposed ordinance to permit other parking lots and storage garages in this district subject to approval by the City Council.

For consistency, as hotels are not permitted to operate dining rooms in the "RE" District, boarding house operation is likewise prohibited.

One of the outstanding weaknesses of the present ordinance is lack of density of population regulations in multiple-family districts. It is proposed to supply this omission by requiring the following lot areas for different classes of buildings.

Single-Family Residence	2,800 Square feet per family
Two-Family Residence	1,600 Square feet per family
Multiple-Family Residence	700 Square feet per family (dwelling unit)
Hotels	250 Square feet per guest room

The proposed density requirements for hotels and apartments are a reasonable minimum standard and in accordance with prevailing conditions. Table Number 5 shows that the average lot area per family provided by all the multiple-family dwellings in Miami Beach was 1,246 square feet and from Table Number 6 it is seen that the average lot area per guest room, for all hotels in Miami Beach, was 222 square feet. From Table Number 3 it is seen that out of a total of 694 apartment buildings only 214 have less than 600 square feet per dwelling unit and from Table Number 4 it is seen

that out of a total of 257 hotels, 155 provide lot areas of more than two hundred square feet per guest room.

A typical lot in the area south of Fifteenth Street contains 7,000 square feet. The proposed regulations would permit an apartment house containing ten units or a hotel containing twenty-eight rooms to be built on such a lot.

The present ordinance requires all classes of dwellings to provide not less than four hundred square feet of floor area per dwelling unit. This is more properly a building code requirement and it is recommended that it be omitted from the new zoning ordinance.

"RH" Hotel District. The principal difference between the proposed regulations in this district and in the "RE" District is in respect to maximum building height and required side yards. It is proposed to place a height limit of one hundred fifty feet or fourteen stories on all buildings erected in these districts in accordance with the proposed height regulations of the building code.

Under the present regulations, buildings may cover an abnormally great percentage of the lot area. For example, in Area District Number 28, which includes much of the intensive hotel development along Ocean & Collins Avenues, front yards of five feet are required, side yards of five feet must be provided, and no rear yards are necessary. On a lot 100 by 150 feet in size, containing 15000 square feet, the build-

ing may occupy 13,050 square feet or 87.0 per cent of the total lot area. This coverage far exceeds any reasonable standard and should not be permitted in the future. The minimum standards for lot coverage for multiple dwellings adopted by the Federal Housing Administration for the State of Florida require, on an interior lot, a coverage not to exceed forty (40) per cent and on a corner lot, a coverage not to exceed fifty (50) per cent. (From Circular Number 2, Property Standards, Part VI for the State of Florida, issued by the Federal Housing Administration, June 15, 1938).

It is proposed to remedy the situation in the following manner.

1. By providing for increased rear yards in "RH" and "RE" Districts.

2. For buildings more than two stories in height to require increased side yards above the second story level.

3. By requiring certain lot areas to be provided according to the number of dwelling units or hotel guest rooms.

Specifically, in the district described above, it is proposed to require a mimimum rear yard of twenty (20) feet, which may be reduced to ten feet if the lot abuts a twenty-foot alley; minimum five-foot side yards must be increased two feet in width for each story above the second and lot areas of not less than two hundred square feet per guest room shall be provided by hotels. No change is proposed in front yards,

resulting from strict adherence to the letter of the ordinance. The building inspector should not be vested with discretion to make these adjustments, as he is an administrative officer, whose duty it is to enforce the terms of the ordinance. The State Law, however, provides that a board of adjustment may be authorized to make such variations in the terms of the ordinance that will prevent undue hardship and at the same time carry out the intent and purpose of the law. The board of adjustment has three functions to perform:

(a) To interpret the ordinance when there is a difference of opinion between the building inspector and the property owner;

(b) To make variations under certain conditions;

(c) To grant special exceptions when authorized in the ordinance.

It must be recognized that a board of adjustment is an administrative body and is not empowered to change the text or district maps. This is a legislative function confined to the City Council. Boards of Adjustment in a great many cities have assumed powers beyond their legal authority, and have made changes in the zoning regulations by granting permits for uses prohibited in certain districts, and by doing other things clearly beyond their power. Such actions inevitably result in a weakening in the stability of the ordinance and a loss of public confidence, to the detriment of zoning in general. Such practices have also led to court decisions in certain states which have so curtailed the powers of these boards as to destroy their effectiveness.

stations as defined, the proposed ordinance provides only for service stations, and omits all reference to filling stations. Such uses are permitted in the "BB" District, provided their location is approved by the City Council.

The "LI" Light Industrial District is so named because the uses permitted in this district are more in the nature of industrial than they are commercial. These uses correspond generally to those now permitted in the "BC" Business District.

The proposed "I" Industrial District is composed generally of the present "BD", "BE" and "BF" Business Districts, and the uses permitted are similar. The storage of petroleum, slaughter of poultry, and ship yards and dry docks are permitted only after approval by the City Council.

The "U" Unrestricted District corresponds to the present "BG" Business District and, as stated previously, is confined to Virginia Key.

One important proposed new regulation applying to all classes of business districts is that which requires commercial uses to provide for off-street loading and unloading facilities on their own property. This provision is made to reduce the congestion resulting from the loading and unloading of trucks in public alleys and in streets in front of buildings which have no rear entrance.

Permitted building heights throughout the business and industrial districts are the same as those in the "RH" Hotel District; i. e., 150 feet or 14 stories.

Buildings erected for dwelling purposes must comply with the density requirements of the "RH" Hotel District. In addition, there is a special provision which applies to residential buildings and hotels erected in businessor industrial districts which requires that such buildings provide a minimum side yard of 10 feet. This provision is important for the preservation of light and air around residential buildings, as no side yards are required for business establishments, and they can be built flush with the property line.

Non-Conforming Uses. The elimination of non-conforming uses has proved to be one of the most troublesome problems arising in zoning administration. In the early days it was assumed that, by prohibiting their enlargement or structural alteration, sooner or later non-conforming uses would disappear. The experience of most cities, however, has been that very few of these buildings are ever removed or converted to conforming uses, and it is apparent that more positive action must be taken in the future if property values in residential areas are to be effectually stabilized and protected. The proposed ordinance provides that

(a) Non-conforming uses of land must be discontinued within one year. This is a reasonable provision because in cases to which it applies, there is no investment in buildings.

(b) A non-conforming building can only be changed in use to another non-conforming use of a more restricted classification or to a conforming use. The present ordinance permits the change of a non-conforming building to another use of the same general classification.

(c) Whenever a non-conforming use has been discontinued for a period of one year, its future use must be conforming.

(d) All non-conforming industrial or commercial building located in any residence district must be removed or changed to a conforming use within a period of fifteen years.

(e) Non-conforming boarding and lodging houses, located in any residence district, must be discontinued within two years, except under certain conditions.

There are certain land uses which are not appropriate to residential districts but which, because of their nature, sometimes require a location in such an area. The proposed ordinance provides a method by which such uses may be permitted in districts from which they are prohibited under the ordinance by action of the City Council after public hearing. These uses include the extraction of top soil and sand, hospitals, clinics and other institutions, cemeteries, community buildings, airports, nurseries and greenhouses, and tourist camps.

Area Districts. Certain changes in the side yard provisions and rear yard provisions of the present area districts are suggested in the new ordinance. In those districts which require side yards of 5 feet, it is suggested that the minimum width be based on 10 per cent of the average width of the lot, so that on lots wider than 50 feet a correspondingly wider yard would be required. As previously explained, there is also a special provision for increasing the width of a side yard in the hotel districts, and such provisions apply to residential buildings erected in business or industrial districts.

In the "RE" and "RH" Districts it is proposed to increase the depth of the required rear yard to 20 per cent of the lot depth, or a maximum of 30 feet. The present practice of building apartment houses and hotels to the rear lot line or within a few feet of the rear lot line will eventually produce a very undesirable condition.

Additional Height and Area Regulations. This section of the proposed ordinance has to do with special conditions not covered in the general height and area provisions, such as permitting certain types of public buildings and institutions to exceed the height limit when required yard spaces are increased, and provisions relating to the height regulations of special classes of business and parts of buildings.

The provisions relating to the construction of docks and wharves, walls and fences and other special structures, follow the present ordinance. The permitted projections in the yard areas also closely conform to present regulations.

Certificate of Occupancy. While the present ordinance requires the issuance of occupancy certificates, for some reason or other this has not been done in the past. A similar provision is included in the proposed ordinance, and it is strongly recommended that its provisions be strictly observed. The detection of illegal uses will be greatly facilitated in the future, if all new buildings and buildings which are changed in use are required to have a certificate of occupancy. One of the greatest difficulties in enforcing

a zoning ordinance is in the case of illegal conversions of single-family residences into boarding or lodging houses or multiple-family dwellings, and the conversion of a multiple-family dwelling into one having a greater number of dwelling units than permitted. Enforcement of the occupancy certificate provision would be very helpful in detecting this type of zoning violation.

Plats. It is proposed to require that all applicants for building permits submit a plat made by a licensed surveyor, which will show the lot to be built upon and the dimensions of the building. This plat, which is a part of the building permit application, will be filed in the office of the building inspector as a permanent record, and would be invaluable in interpreting the provisions of the zoning ordinance relating to yards and other open spaces. It would also prevent violation of the ordinance by subsequent use of the open spaces provided for the original building by a new building lacking sufficient space on its own lot to meet the requirements.

Board of Adjustment and Administration. Boards of Adjustment fulfill an important part in zoning administration. In devising a zoning ordinance which applies to all of the property within a city, it is obviously impossible to cover every conceivable situation which might arise as building development progresses. Therefore, there must be some means to adjust unforeseen difficulties and prevent undue hardship

resulting from strict adherence to the letter of the ordinance. The building inspector should not be vested with discretion to make these adjustments, as he is an administrative officer, whose duty it is to enforce the terms of the ordinance. The State Law, however, provides that a board of adjustment may be authorized to make such variations in the terms of the ordinance that will prevent undue hardship and at the same time carry out the intent and purpose of the law. The board of adjustment has three functions to perform:

(a) To interpret the ordinance when there is a difference of opinion between the building inspector and the property owner;

(b) To make variations under certain conditions;

(c) To grant special exceptions when authorized in the ordinance.

It must be recognized that a board of adjustment is an administrative body and is not empowered to change the text or district maps. This is a legislative function confined to the City Council. Boards of Adjustment in a great many cities have assumed powers beyond their legal authority, and have made changes in the zoning regulations by granting permits for uses prohibited in certain districts, and by doing other things clearly beyond their power. Such actions inevitably result in a weakening in the stability of the ordinance and a loss of public confidence, to the detriment of zoning in general. Such practices have also led to court decisions in certain states which have so curtailed the powers of these boards as to destroy their effectiveness.

The provisions in the section on "Board of Adjustment" have been drawn with these thoughts in mind.

In considering zoning administration in general for Miami Beach, it would not be inappropriate to make certain suggestions for the future. These suggestions are summarized as follows:

(a) It is important that the proposed new building code be adopted at the same time, or shortly after, a new zoning ordinance is passed. This proposed new code has been under preparation for several years and embodies many regulations which should be put into effect at the earliest possible moment, particularly since there is such a great amount of building being done in Miami Beach. The building code and the zoning ordinance complement each other, and the two should be administered together.

(b) The Building Department has an insufficient number of inspectors to adequately protect the public's interest during the periods of active building construction. It is recommended that provisions be made for employment of additional inspectors during the summer season, during which time building is most active.

(c) There is a tendancy on the part of certain unscrupulous developers to evade the provisions of the zoning ordinance by alteration of plans while buildings are under construction. These evasions are difficult to detect under

present conditions, and additional inspectors are needed as suggested above. In addition, serious consideration should be given to the preparation and adoption of a minimum housing standards code which would regulate such things as the minimum size of rooms, the amount of window space to be provided, the number of persons occupying sleeping rooms and the like. During the winter season there is a great deal of overcrowding, particularly in rooming houses. Rigid enforcement of such a code would eliminate many of the evils now present in certain parts of the city during the peak of the season.

(d) Enforcement of the occupancy certificate provisions and the requirement for filing of a survey plat with the building permit applications, as discussed previously, would also greatly strengthen the zoning administration.

Conclusion

The proposed ordinance is comprehensive in accordance with the dictates of the State Law. Its adoption should materially reduce the multitude of zoning changes requested by individuals. Hereafter, these requests should be studied from the standpoint of the entire city rather than the property itself, or the small area immediately adjacent thereto.