



February 24, 2020

Florida Department of Business and Professional Regulation
2601 Blair Stone Road
Tallahassee FL 32399

Re: Community School of Naples – New Athletic Field and Stadium
Waiver# 446-R0
Licensed Design Professional Comments

In response to item #11 of the waiver application, I offer the following considerations. Generally, the Florida Building Code (FBC) is derived from and periodically updated by the International Building Code (IBC), which is then injected with Florida specific amendments. Now the IBC Chapter 11 Accessibility states the following:

1104.3.2 Press boxes.

Press boxes in a building, room or space used for assembly purposes shall be on an *accessible route*.

Exceptions:

1. An *accessible route* shall not be required to press boxes in *bleachers* that have a single point of entry from the *bleachers*, provided that the aggregate area of all press boxes for each playing field is not more than 500 square feet (46 m²).
2. An *accessible route* shall not be required to free-standing press boxes that are more than 12 feet (3660 mm) above grade provided that the aggregate area of all press boxes for each playing field is not more than 500 square feet (46 m²).

Using this standard, this project fits within the criteria of exception 1 as the press box is located within the bleachers and is less than 500 SF.

It should be noted that this same verbiage was adopted into the Federal Accessibility Code.

The Florida Accessibility Code does not address pressboxes specifically and in the absence of clear definitions design professionals refer back to the federal code for guidance. In conversation with other design professionals, building officials and private providers this has always held true.

I trust that this fulfills the requirements of the Design Professional Comments on this subject, and do not hesitate to contact my office should any additional information be needed.

Sincerely,

A handwritten signature in blue ink that reads 'R. Richards'.

Ryan S. Richards, AIA LEED AP
AR 94102
RG Architects, PA.
Partner