



March 28, 2018

Mr. Chip Sellers  
Honorable Members of the Florida Accessibility Council  
The Florida Building Commission - Accessibility Council  
Department of Business and Professional Regulation  
Division of Codes and Standards  
2601 Blirstone Road  
Tallahassee, Florida 32399

RE: Vertical Accessibility Wavier from the Florida accessibility Council  
Epsilon Zeta Chapter of the Kappa Kappa Gamma Sorority at Florida State University

Dear Mr. Sellers and Members of the Florida Accessibility Council,

My name is Jerry A. Scott Jr., AIA, LEED AP BD+C, (J.J. Scott) and I am the President and Principal Architect of MLD Architects, located in Tallahassee. I serve as the Architect of Record for the balcony deck replacement project at the Epsilon Zeta Chapter of Kappa Kappa Gamma Sorority at Florida State University located at 528 West Jefferson Street on the Florida State University campus. This application requests your strongest consideration of a WAIVER of vertical accessibility for the chapter house based on the financial infeasibility of the project, the restricted access of the public, accommodations previously made for those with disabilities on the first floor, and an immediate need to restore access to the additional means of egress.

Originally built in 1950's, The Kappa Kappa Gamma Sorority house is three stories and a basement totaling approximately 18,070 square feet. The building has white painted brick walls reflecting a traditional colonial style with a large columned portico and a central balconette with wrought iron railings. The house has largely remained in its original configuration apart from an early 2000's renovation that installed a new fire stair and included renovations to accommodate members with accessibility needs on the first floor. Since then, few modifications have been made to the house other than repainting and minor HVAC and kitchen equipment changes. The building is sprinkled and fire alarmed.

The project scope consists of the replacement of an existing deteriorated and structurally unstable wood balcony deck with a new modern steel and concrete structure which contrasts aesthetically with the historic chapter house. Originally the design was a style that blended in with the aesthetic of the house, however, due to budgetary restrictions this was financially infeasible. Therefore, the deck was redesigned to be a simpler more modern structure which would be less expensive to construct yet maintain the ease of maintenance and upkeep.

We are respectfully requesting a waiver form Vertical Accessibility so as not to have to retrofit this wood frame floor structure with an elevator, or a Limited Use, Limited Access ("LULA") lift due to the disproportionate cost necessary to provide an adequate foundation, penetration and reframing of the second and third floors and roof framing. Inclusion of an elevator in a building not designed for such equipment also will result in additional costs for remotely located elevator equipment machine room, Fire



proofing of the proposed shaft way and the unintentional penetration of the roof frame which would require a redesign of the building façade and affect the historic character of an otherwise undisturbed aesthetic. The cost of this project was originally projected to cost less than \$165,000. The required addition of additional vertical accessibility equipment will add over \$212,000 dollars of additional cost to the project. Please see the attached Cost Estimate prepared in compliance of your cost reporting criteria prepared by the Contractor, Oliver-Sperry Renovations of Tallahassee. We believe that these excessive costs meet the standards of disproportionate cost and achieves no practical benefit for a sister of the sorority with a disability, as with the previous enhancements provide for all the social and fraternal functions and services to be accommodated on the first-floor level. In addition, inserting an elevator where it can be adjacent to a corridor, common area, or public space without reducing the number of bedrooms or minimal area needed to function, is nearly impossible. The only location available to install the elevator would disrupt the flow and every day functions of the house and negatively impact the use of multiple spaces on each floor level including a council room, dining room, parlor, and study.

Due to various possible threats, KKG leadership has implemented several safety protocols to protect the members and made the house and back yard virtually inaccessible to the public. Only select visitors are allowed into the home, by appointment. All visitors must use an intercom to identify themselves and reason for visiting to have the door unlocked by the house mom and will then will be escorted through the house. All visitors are restricted to the first floor. Therefore, the need for visitor access to the other floors is not permitted, nor necessary.

Referencing FAC Chapter 2 Scoping Requirements, Section 206 Accessible Routes, 206.2.3 Multi-Story Buildings and Facilities, Advisory 206.2.3 Exception 4, the owner has stated that accessible accommodations were made to the first floor of the home when a member was selected some years ago that was wheel chair bound. They stated that those accommodations remain in place today. Members Only private rooms and bathrooms are on the second and third floors except for a small study and tv room on the 3<sup>rd</sup> floor, replicating those on the first floor. All accommodations available on the basement, second and third levels are available on the first floor including private bedroom and bathroom for those with disabilities. First floor amenities are available/ accessible to every member including an exterior patio. All common areas are on the first floor and serve accessible first floor rooms. No common areas exist on the second or third floors that do not also exist on the First Floor.

This deck also serves as an additional means of egress from the second and third floors. Currently the existing wood deck is structurally unstable and KKG leadership has blocked access to the deck due to fears of possible collapse. This is not a required means of egress; however, it is an additional means of egress which can be helpful when evacuating a structure.

Your consideration and a favorable conclusion regarding this request for a waiver would be appreciated. Should you have any questions regarding this submittal and request for waiver, please feel free to contact our office. We will be available during your deliberations either in person or via telephone to answer any questions that your council may have.

Sincerely,



J.J. Scott, AIA, LEED AP BD+C  
President/Principal Architect

