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**To: Department of Business and Professional Regulation  
FLORIDA BUILDING COMMISSION  
1940 North Monroe Street  
Tallahassee, Florida 32399-0772**

**From: L. Hugh Anglin, P.E.**

**Re: REQUEST FOR WAIVER FROM ACCESSIBILITY REQUIREMENTS OF  
CHAPTER 553, PART II, FLORIDA STATUTES**

**Date: March 14<sup>th</sup>, 2020**

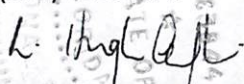
**333 Jefferson Holdings, LLC**

The buildings are existing and were design and built in the 1920s & 30s. At the time of design the need for elevators was not contemplated and no accommodation was made for their present or future use. As a result spaces were designed as compactly and efficiently as possible. To now add either interior or exterior elevators to these existing structures entails dealing with physical constraints of the properties and their limited space. Enforcement of these requirements would present a prohibitive financial obstruction to the renovation and remodeling of these properties for two main reasons: Firstly, the first cost of adding elevators to this renovation more than doubles the cost of renovating the building. This arises from the fact that all the required infrastructure for the installation of the elevator would have to be newly installed and would involve the demolition and reconstruction of a substantial part of the existing structure. Secondly, said demolition and renovation would convert previously rentable space into common area and thus space from which no revenue would be produced. This pushes the entire project into range of financial unfeasibility.

To comply with accessibility requirements, a unit on each floor will be required to be eliminated. This hardship represented here is that there would be a simultaneous increase in capital cost while reducing the revenue required to offset said cost.

Each unit has individual exterior access, no internal connectivity, and this creates a hardship originated by means of its initial construction in 1939. We have attempted to mitigate this problem by creating ADA spaces on the ground floor, and providing horizontal access to these spaces in lieu of attempting vertical access.

Thank you for your time in this review. Should any additional information be required, please advise at (954) 562 1904.

  
Respectfully submitted,  
L. Hugh Anglin, PE # 63844

