

July 9, 2019

Members of the Florida Building Commission & Accessibility Advisory Council
c/o Chip Sellers
Office of Codes & Standard, Florida Department of Community Affairs
2601 Blair Stone Road
Tallahassee, Florida 32399

RE: 1434-1440 Washington Avenue and 400-418 Espanola Way, Miami Beach, Florida – Clay Hotel

Dear Mr. Sellers and Members of the Commission and Council:

Based on the existing conditions of the Clay Hotel located at 1434-1440 Washington Avenue and 400-418 Espanola Way, Miami Beach, it is technically infeasible to provide vertical accessibility to all areas of the Clay Hotel. The City of Miami Beach Historic Preservation Board approved partial demolition, renovation, and extensive restoration of the Clay Hotel. Restoration of the Clay Hotel requires compliance with ADA accessibility regulations. However, due to the existing layout it is technically infeasible to provide vertical access to certain buildings. Please allow this letter to serve as the Licensed Design Professional's comments for the accompanying ADA Waiver request.

The historic Clay Hotel was designed with one larger continuous structure that fronts the abutting public rights of ways and four (4) small, internal courtyard buildings. The courtyard buildings are each two-stories. There are extremely narrow alleyways between the main structure and the courtyard buildings, and between the courtyard buildings that serve as both access ways and required life-safety egress. Additionally, there is a four (4) inch step to enter three (3) of the courtyard buildings. The first floor of the first building on east will be connected to the main lobby, and therefore accessible unlike the first floors of the other three (3) buildings. None of the courtyard buildings have capacity for individual elevators, ramping to the alleyway, or lifts to the second floors. Vertical accessibility will be provided to all rooms in the main structure, as well as all the hotel amenities, including the roof top pool and deck, the main lobby, and a living room on the first floor of the eastern most courtyard building.

We extensively reviewed and analyzed potential options to add a ramp to the each structure, but deemed it technically unfeasible because the ramps and/or lifts would simply not fit in the between the existing structures and additional ramps and/or lifts would conflict with required life-safety egress.

Please do not hesitate to contact me if you need additional information on the matter.

Respectfully Submitted,



Francilis J. Domond, RA
AR - 93304

