

February 14, 2026

Accessibility Advisory Council
Florida Building Commission
Florida Department of Business and Professional Regulation

RE: Cathcart House – 38 S. Swinton Ave, Delray Beach, FL 33444

Subject: Vertical Accessibility to the Second Floor

To Whom It May Concern,

As the Engineer of Record for the interior alteration project at the Cathcart House (Delray Beach Building Department Permit Application Number: BLDC-007616-2025), I am submitting this letter in support of the accompanying ADA Waiver request. After a comprehensive evaluation of the existing historic structure, we have determined that providing vertical accessibility to the second floor in full compliance with Florida Building Code Section 553.509 is neither technically feasible nor economically practicable.

The Cathcart House, constructed in 1902, is a two-story wood-framed historic residence located within the Old School Square Historic Arts District. It is a contributing structure of significant architectural and cultural value to the early settlement history of Delray Beach. The installation of an elevator would require substantial structural intervention that would threaten or destroy the historic integrity of the building.

Supporting files are attached for your review, including:

- A letter from the Delray Beach Historical Society outlining the historical significance of the Cathcart House
- A letter from the State Historic Preservation Office supporting the waiver of vertical access to the second floor.
- A structural feasibility analysis evaluating potential impact of elevator installation by FL licensed Engineer
- Contractor cost estimates for the proposed accessibility modifications
- Architectural Drawing Set including Impact Sketches / Overlay

These materials substantiate the following:

1. **Historic Structure Consideration:** The building qualifies as a historic structure, and achieving full vertical accessibility would necessitate alterations that are not readily achievable without adversely affecting the historic character, architectural fabric, and structural stability of the property.
2. **Disproportionate Cost:** The projected costs associated with providing an accessible path of travel to the second floor exceed the 20% disproportionate cost threshold outlined in FBC Accessibility Code Section 202.4.1. As defined, when the cost of accessibility improvements surpasses 20% of the overall project cost for the primary function area, the requirement imposes an undue financial burden on the Owner.

Please feel free to contact me should additional information or clarification be required.

Sincerely,

Tianchen Hu

