



ARCHITECTURE INTERIOR DESIGN PLANNING

May 6, 2025

Members of the Florida Building Commission & Accessibility Advisory Council
c/o Chip Sellers
Florida Building Commission Codes and Standards Office
Florida Department of Business & Professional Regulation
2601 Blair Stone Road
Tallahassee, Florida 32399

RE: 1101 NW 23 Street – Accessibility Waiver Application File No. 721-0 for Es Devlin Exhibit

Dear Members of the Commission and Council:

The property is located at 1101 NW 23 Street, Miami, Florida (the “Property”) and is developed with a large commercial structure housing multiple immersive art installations, shared amenities, and event areas that are open to the public (the “Superblue Facility”). The subject of the application, the “Es Devlin” exhibit, occupies only a small portion of the building. Based on the existing physical, structural, and artistic conditions within the “Es Devlin” exhibit (the “Exhibit”), it will be technically infeasible to provide vertical accessibility to the mezzanine level of the installation. Notably, all other areas of the Superblue Facility, including ingress and egress, are fully ADA accessible. Please allow this letter to serve as the Licensed Design Professional’s comments for the accompanying ADA Waiver request.

The Exhibit totals approximately 5,175 square feet and was originally approved as a temporary installation and is now seeking to be made permanent, prompting the requirement for an accessibility waiver. The small mezzanine level, comprising only 694 square feet, does not introduce new programming, but rather serves as a continuation of the immersive experience and comprises only approximately 13.4% of the Exhibit, which accounts for just 1.4% of the entire Superblue Facility.

The “Es Devlin” installation is a site-specific experience comprised of mirrored tunnels and a maze-like configuration with projection-based immersive sequences reflecting human and environmental biology. The layout is intentionally continuous and curvilinear, with a mirrored ceiling that highlights all openings from above. The mirrored panels, which define the visual and spatial character of the exhibit, are supported by a concealed but robust structural framework necessary to maintain both the integrity and safety of the installation. This framework, combined with the modular nature of the exhibit’s construction, severely limits any feasible location for the installation of a vertical access system within the Exhibit itself.



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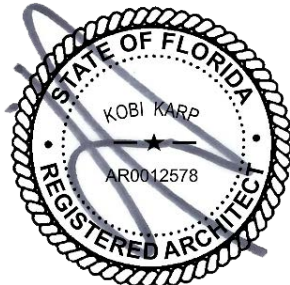
Additionally, the small footprint of the second level greatly limits placement of a lift just outside the Exhibit area. The few available spots would impede life-safety infrastructure, fire suppression, critical emergency egress corridors and interfere with adjacent programming and programmatic flow of the experience. In particular, the potential exterior locations for a lift would disrupt access to the film room component of the Exhibit, as well as affect circulation patterns related to other surrounding installations. This would compromise the curated sequencing of the guest experience and introduce operational and life-safety concerns that cannot be resolved without significant disruption to the overall use of the Superblue Facility.

Due to the Exhibit's modular construction, spatial constraints, and integration of specialized visual and structural components, any attempt to retrofit with a vertical lift within or adjacent to the Exhibit would compromise both safety and artistic intent and is technically infeasible.

Respectfully submitted for your consideration and approval.

Should there be any questions please feel free to contact this office.

Sincerely,



Kobi Karp
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CC: Mario Gonzalez – Superblue
Matthew Amster – BRFL+T