



## FLORIDA DEPARTMENT *of* STATE

**RON DESANTIS**  
Governor

**Cord Byrd**  
Secretary of State

February 7, 2023

Maria Leon  
24 South Orange Avenue,  
Orlando, Florida, 32801  
[Liftedoffice22@gmail.com](mailto:Liftedoffice22@gmail.com)

RE: Received by DHR: January 24<sup>th</sup>, 2023  
Project: *ADA Sec. 202.5 Exemption Waiver Review:*  
24 South Orange Avenue, Orlando, Florida, 32801  
County: Orange

To Whom it May Concern:

At your request we reviewed the above referenced property pursuant to the procedures set forth in Section 202.5 – *Alterations to Qualified Historic Buildings and Facilities*, 2020 Florida Accessibility Code for Building Construction, 7th Edition, codified in 28 CFR Part 36 and equivalent procedures implementing Sections 553.503 of the Florida Statutes.

The above referenced property is a locally designated as a contributing resource to the Orlando Downtown Historic District. This project was brought forth by one of the tenets in the upstairs section of the building. The shop in question is currently a retail store, and as such, does not require the special considerations mandatory for law offices, government offices, schools, or doctor's offices. This property is a low, 2-story brick building, which, according to the property appraisers report, was built in 1888. It is 2 bays over 2 bays, split in the middle by a 358 square foot stairway providing access to the shops on the second floor. Currently, the area that provides vertical access is the stairway which is approximately 5 feet wide. In order to install an elevator to comply with ADA standards the elevator would have to fit within the existing stairwell space. Without further information to understand the layout of the stairwell in relation to the second-floor landing, it is impossible to understand if the second-floor landing could be altered to accommodate a lift; nor is it likely to fit within the existing 3-foot confines of the stairwell as most elevators need 5 to 7 feet of space lengthwise plus accommodations for the elevator shaft. Without having the blueprints for the building, it is impossible to determine whether or not creating the space needed for elevator would affect any load bearing walls or historical fabric. However, based on the type of building it is, the year it was built, and knowledge of other buildings configured the same way from the same time period, it is very likely that construction of an elevator shaft would threaten or destroy load bearing supports, fire walls, and/or the historic fabric of the building.

**Division of Historical Resources**  
**R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399**  
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Therefore, it is the opinion of this office that the property is eligible for the exemption granted Qualified Historic Buildings and Facilities per Section 202.5 of the FACBC, 2020 as the considered measures to meet full compliance with the requirements for vertical accessibility would threaten or destroy the historic fabric of the above referenced project. However, if it can be done without affecting the structural integrity of the building and be placed within the existing stairwell corridor, then it would have no adverse effect on the historical significance of the building. As such, I recommend careful consideration and an in-depth review of this particular property by the board.

If you have any questions, please contact Kyra Lucas, Historic Preservationist, by email at [kyra.lucas@dos.myflorida.com](mailto:kyra.lucas@dos.myflorida.com), or by telephone at 850.245.6339.

Sincerely,

A handwritten signature in blue ink that reads "Kelly L. Chase" with "For" written below it.

Alissa Slade Lotane  
Director, Division of Historical Resources  
& State Historic Preservation Officer