

MIAMIBEACH

PLANNING DEPARTMENT

1700 Convention Center Drive, Miami Beach, Florida 33139; Tel: 305.673.7550; www.miamibeachfl.gov/planning

July 7, 2026

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

RE: 1849 James Avenue, Miami Beach, Florida

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

The City of Miami Beach Planning Department submits this letter in support of the applicant's request for a waiver of the vertical accessibility requirements for the above-referenced historic property.

The James Manor Apartments (the "Property") was constructed in 1950 and designed by MacKay and Gibbs, an influential Miami Beach firm associated with the Post-War style of architecture. The Property is designated "Contributing" in the Miami Beach Historic Properties Database and is located within the Miami Beach National Register Architectural District, the Museum Local Historic District, and the Art Deco/MiMo Commercial Character Overlay District.

The Property is a two-story, garden-style apartment building, a popular Post-War concept in Miami Beach. The U-shaped structure features an open courtyard with a long, narrow central fountain that leads to the main entrance and lobby at the west end of the Property. The units are arranged mainly in sets of four, with two units at the ground level and two on the second level. There are no central hallways or interior corridors connecting the units within each wing. The tiered relationship between the outdoor courtyard and the interior spaces is the signature of the design: ground-level units have individual fronting terraces that are slightly elevated above the courtyard and reached by a minimal number of steps, and all second-floor units are reached by staircases from the courtyard.

With its tiered levels, the Property retains an extraordinary degree of historic and architectural integrity and is representative of the diversity of architectural styles that have evolved within the City's historic districts. The proposal to retain, preserve, and restore the Property in its original configuration, including the outdoor courtyard, is important to the public understanding of the development of architecture in Miami Beach.

The subject structure qualifies as a qualified historic building under the Federal ADA regulations, the ADA Accessibility Guidelines (ADAAG) and Chapter 11 of the Florida Building Code. The requested waiver pertaining to vertical accessibility is critical to the restoration plan for the building. In order to accommodate vertical accessibility, substantial modifications to the structure would be required, such as the installation of multiple ramps to serve all first-level units and up to 8 elevators to provide access to the second-floor units, since there are no common corridors

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within the building. Full compliance would be technically infeasible without compromising the historic integrity of the building's original design. The applicant's design professionals have indicated that the renovation plans, including the addition of accessible pathways and ramps that provide access to the lobby and two units on the first floor conform with federal ADA and the Florida Building Code's provisions regarding accessibility in all other respects.

For the reasons stated above, and based on the historic significance and integrity of the structure, the Planning Department supports the applicant's request for a waiver of the vertical accessibility requirements.

Should the Council require any additional information regarding the historic significance of the structure, please do not hesitate to contact me.

Sincerely,

DocuSigned by:



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Deborah Tackett, AICP
Planning Director