



July 8, 2026

Florida Building Commission Codes and Standards Office

Florida Department of Business & Professional Regulation

2601 Blair Stone Road, Tallahassee, Florida 32399

Attn: Members of the Florida Building Commission & Accessibility Advisory Council
c/o Chip Sellers

RE: 1849 James Avenue – Accessibility Waiver Application File No. 772-R1

Dear Members of the Commission and Council:

The property is located at 1849 James Avenue, Miami Beach, Florida (the “Property”) and is improved with a historic thirty-four (34) unit apartment building constructed in 1950. We are assisting the owner of the Property with renovations to convert the building to a hotel, inclusive of ADA and life-safety upgrades (the “Project”). Please allow this letter to serve as the Licensed Design Professional’s comments for the ADA Waiver request. Based on the existing physical and structural conditions within the Property, it will be technically infeasible to provide ramps, lifts, or other vertical accessibility mechanisms to serve all the ground-floor and second-floor units.

The building was originally designed and constructed as a garden-style apartment structure with residential units arranged in separate pod groupings. The units are primarily organized in groupings of four (4), consisting of two (2) ground-floor units and two (2) second-floor units. As originally built, the first-floor units are elevated above the courtyard and served by stairs, and the second-floor units are accessed by exterior staircases extending from the courtyard. There are no common access hallways serving either level and no vertical accessibility mechanisms were incorporated into the original construction.

The relationship between the courtyard and the residential units is inherent to the building’s architectural design and character, as well as serves as the required life-safety egress. Ground-floor units are intentionally elevated above the courtyard, with individual terraces accessed by a small number of steps from the courtyard level. The remaining portions of the courtyard perimeter contain landscaped areas that contribute to the building’s garden-style appearance. Second-floor units are similarly accessed through exterior stairways centrally located within each grouping of units. Like many garden-style apartment buildings of its era, the structure was conceived and constructed without consideration for elevators, interior corridors, or areas sufficient to accommodate vertical accessibility devices.

Frontier Engineering Development, LLC, FL C.A. No: 30629

P.O. Box 222023, Hollywood, FL 33022

Office (954) 678-2030 · fax (954) 678-2032 · Email: Info@myfloridaengineering.com



Providing compliant vertical access to all upper-level units would require substantial structural alterations throughout the building. Due to the narrow dimensions of the courtyard and the unique arrangement of the building's individual unit groupings, there is no feasible location to install the numerous elevators, lifts, or ramps that would be necessary without significantly altering the building's defining architectural features or eliminating substantial portions of the courtyard. Any such installation would fundamentally alter the historic character of the building.

Further, the building's constrained width, irregular layout, and numerous architectural features create significant limitations on the available floor area both inside and outside the building. The majority of the ground floor and courtyard areas are required to maintain compliant life-safety egress pathways serving occupants throughout the building and exiting the Property. Installation of additional accessibility infrastructure within these areas would create direct conflicts with required means of egress and impede life-safety functions.

Due to the building's age, configuration, structural limitations, and the need to preserve life-safety egress, it is technically infeasible to provide compliant vertical access to the elevated ground-floor units and second-floor units. Strict compliance would compromise life safety and impede the functional use of the space.

Respectfully submitted for your consideration and approval.

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

Sincerely,

Venkatesan Murugar Balakrishnan, P.E.
Frontier Engineering Development, LLC
Fl. Reg. No: 63107

CC: Matthew Amster – BRFL+T
Zakary Benjelloun – BRFL+T