


**Design Professional's Comments:**

1536 Jefferson Avenue is one of four (4) historic buildings/sites that have been unified and operate as a single site and a single hotel. This was accomplished in or about 2010 by the prior owner of 1536 Jefferson Avenue. Each of the buildings is of a small scale in relation to the hotels in Miami Beach and accommodate a total number of units is 31.

Due to the difficulties in providing accessible rooms in some of the historic buildings, the total room count was used in the manner set forth in Section 224.6.1 of the 2012 Florida Accessibility Code ("2012-FAC"). (It should be noted that while Section 224.6.1 of the 2012-FAC is being cited, the provisions of Section 224.6.1 of 2012-FAC are taken from 28 CFR 36.406(c)(1)(ii) of the Title III regulations which took effect on September 15, 2010.)

Due to the building's historic configuration, it is not possible to provide vertical accessibility in the interior of the buildings. As the drawings demonstrate, the implementation of a stair-lift would impermissibly encroach the required means of egress (The Authorities Having Jurisdiction considers the amount a lift encroaches into the fire stair when fully open and the amount of encroachment into the required means of egress). Therefore, it is technically infeasible to provide vertical accessibility within the interior of the historic buildings. In order to provide vertical accessibility, the only other option would require constructing an elevator tower in front of, and attached to, the historic façade of the buildings, thereby threatening or destroying the historic character of the buildings.

Providing the vertical accessibility to 1536 Jefferson Avenue without threatening or destroying the historic character of the buildings would be technically infeasible, I respectfully request that the Council recommend and the Commission grant a waiver from providing vertical accessibility.



---

Wesley Castellanos

