



## FLORIDA DEPARTMENT *of* STATE

**RON DESANTIS**  
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Robert Alexander  
Bercow, Radell, Fernandez, Larkin, and Tapanes  
200 South Biscayne Boulevard, Suite 300,  
Miami, Florida, 33131.  
[RAlexander@brzoninglaw.com](mailto:RAlexander@brzoninglaw.com)  
(305) 377-6230

September 8, 2022

RE: Received by DHR: Thursday, September 1<sup>st</sup>, 2022  
Project: *ADA Sec. 202.5 Exemption Waiver Review:*  
*411 Michigan Avenue, Miami, Florida, 33139*  
County: Dade

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 historic structure contributing resource to the Ocean Beach Historic District. The property, which currently houses a historic 2-story apartment building and a detached garage converted into offices. Both structures are being relocated from their current position on the property to the Southwest corner of the property. The structures are to be relocated directly adjacent to each other with a 3 foot connector between them. To the South, the buildings will be located on the zero lot line. To the East, they will be bordered by a new construction garage. To the North, the buildings are bordered by an internal thoroughfare that provides access from the street to the garage. On the West side, the lot line is zero, but the building will be set back 15 to 16 feet to accommodate a stair. The 1 story structure will be gutted, have its roof removed, and be remodeled as an open atmosphere café lounge. The 2 story structure will have its 2<sup>nd</sup> story floor plate removed and a skylight will be added to provide light to café. Typically, none of these things alone would be enough to be considered for an ADA exemption. However, both structures, upon their relocation, will be elevated to a new height of 9 feet above sea level, which is currently approximately 6 feet above street grade. With the amount of space provided between the buildings entrance and the sidewalk there is no technically feasible way to erect an ADA compliant ramp even with the maximum slope ratio and back to back switchbacks.

**Division of Historical Resources**  
**R.A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399**  
**850.245.6300 • 850.245.6436 (Fax) • FLHeritage.com**



The applicant also considered installing a platform lift. However, due to size of the lift, the amount of area needed to accommodate it, and the location it would have to be in, they choose not to pursue this option as it would negatively affect the visual impact and historic character of the building

Therefore, it is the opinion of this office that the property is eligible for a vertical accessibility 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 accessible routes and entrances would threaten or destroy the historic significance of the above referenced project or is technically infeasible.

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