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Department of Business and Professional Regulation  
FLORIDA BUILDING COMMISSION  
2601 Blair Stone Road  
Tallahassee, Florida 32399-0772  
Form FBC 2014-01

**Re: Waiver# 727-R0 for Office Alteration at 420 3<sup>rd</sup> St South, Jacksonville, Beach, FL 32250**

To whom it may concern,

For vertical accessibility, the Florida Building Code (FBC 201.1.1.1) and Florida Statue (F.S. 553.509) are more stringent than ADA Standards. FBC and F.S. require vertical accessibility for all levels of altered areas in existing buildings. Meanwhile, ADA Section 206.2.3 Exception 1 exempts the project from vertical accessibility due to its size and function (less than 3,000 square feet and not a shopping center, shopping mall, health care provider office, terminal, depot, public transportation facility, or airport).

Therefore, the owner has applied for an Accessibility Waiver with the State of Florida, so that the Florida specific vertical accessibility requirement may be waived down to the ADA Standards.

**FBC 201.1.1 Vertical accessibility.**

Sections 553.501-553.513, F.S., and the ADA Standards for Accessible Design do not relieve the owner of any building, structure or facility governed by those sections from the duty to provide vertical accessibility to all levels above and below the occupiable grade level regardless of whether the Standards require an elevator to be installed in such building, structure or facility.

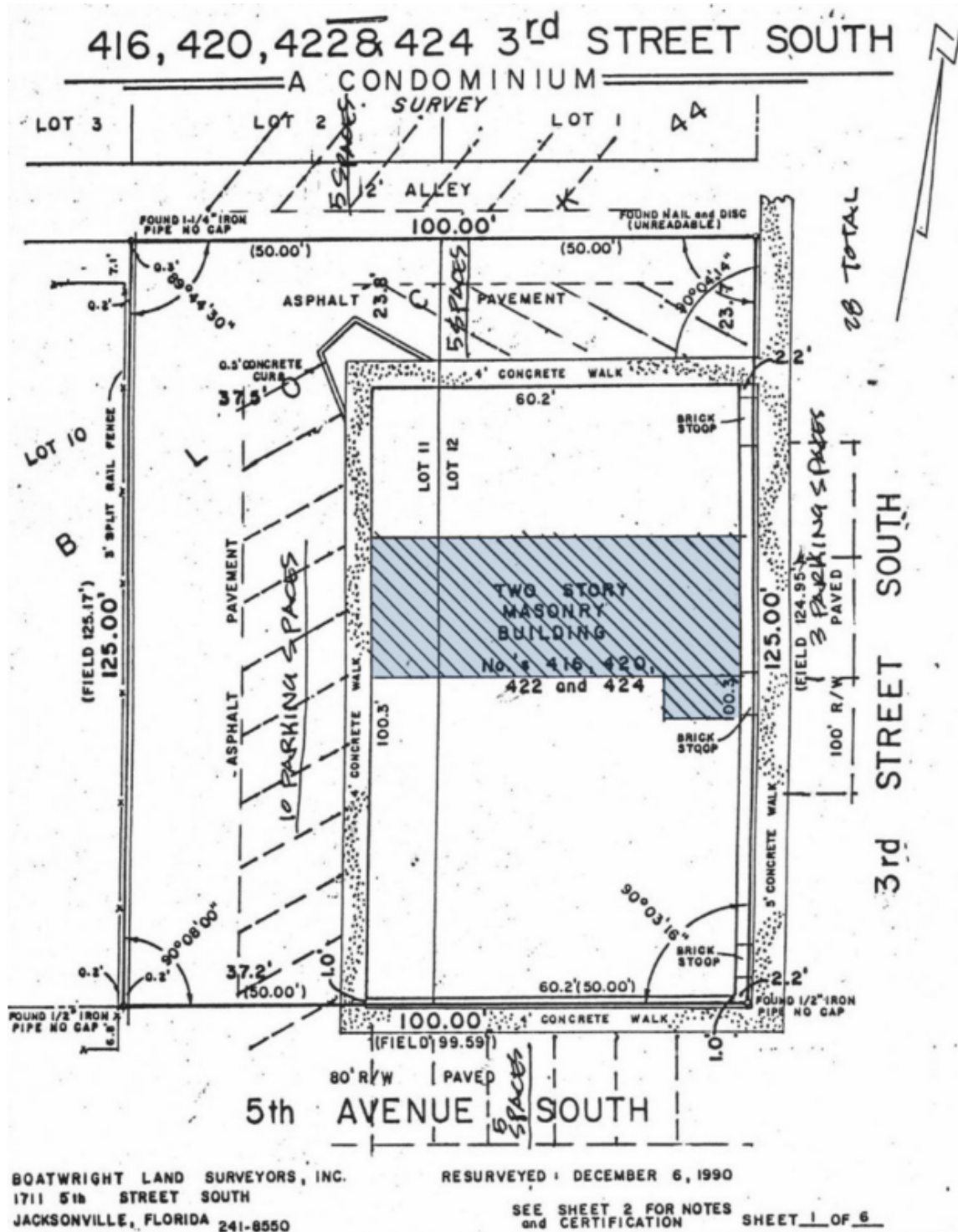
**F.S. 553.509 Vertical Accessibility.**

(1) This part and the Americans with Disabilities Act Standards for Accessible Design do not relieve the owner of any building, structure, or facility governed by this part from the duty to provide vertical accessibility to all levels above and below the occupiable grade level, regardless of whether the standards require an elevator to be installed in such building, structure, or facility, except for

In addition, while vertical accessibility provisions (ramp, elevator, wheel lift, or stairlift) are physically possible to construct in the space, they would create spatial constraints and are not economically feasible. The vertical accessibility provisions (ramp, elevator, wheel lift) would reduce valuable usable area on Level 1 (1,262 sf) and Level 2 (875 sf), negatively impacting business operations. Additionally, reconfiguring existing load-bearing structural members to accommodate vertical accessibility provisions would be cost prohibitive to the owner.

Note, the office will not be accessible to the public, and Chang Robotics employees primarily work remotely. The office primarily provides temporary workspace for visiting and remote employees.

Considering the break room and restroom are both on Level 1, the owner can offer reasonable accommodation for any employee with accessibility challenges, such as hosting team meetings and setting up an office workstation on Level 1, as required.

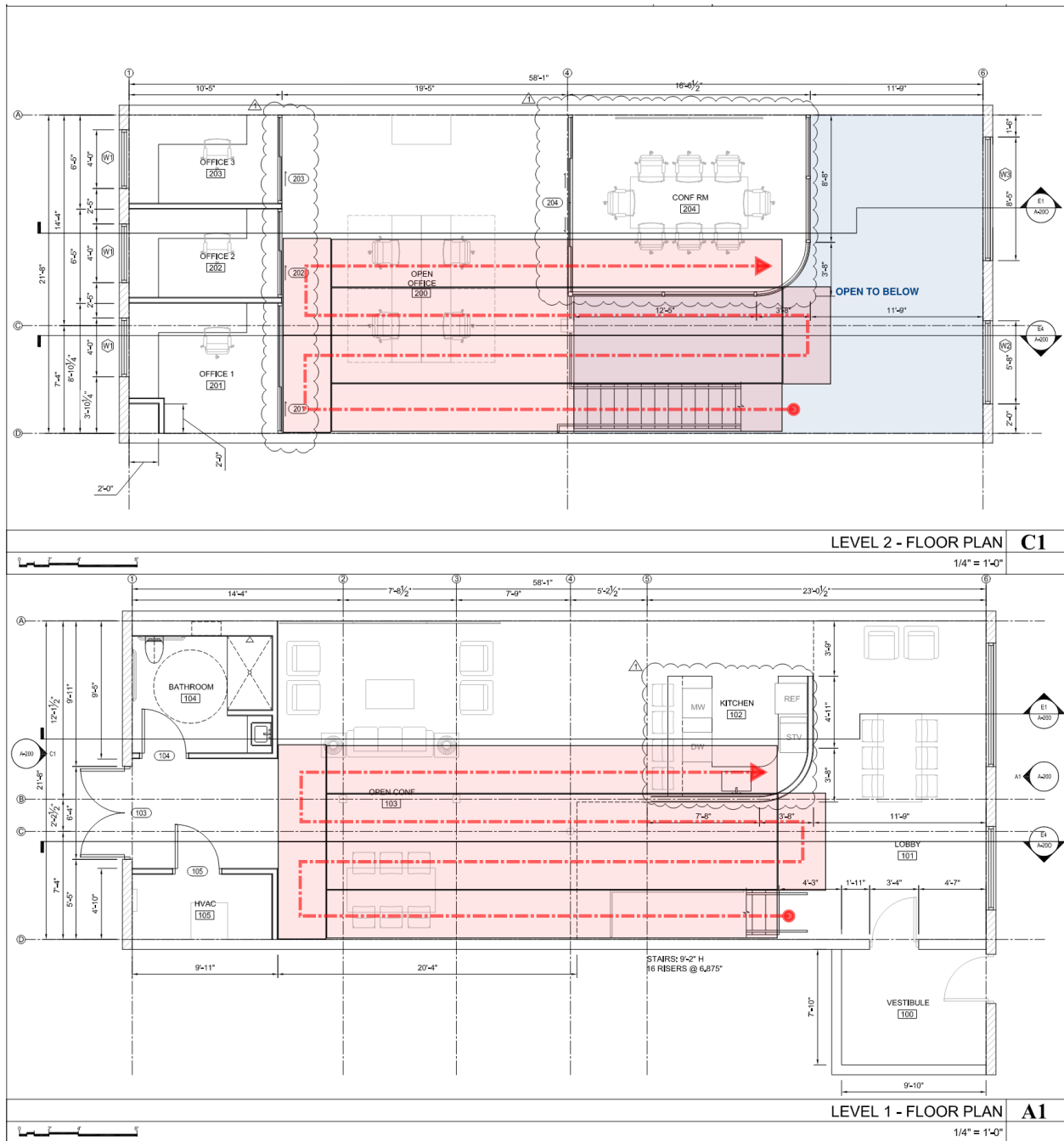


## Exhibit 1 – Site Plan



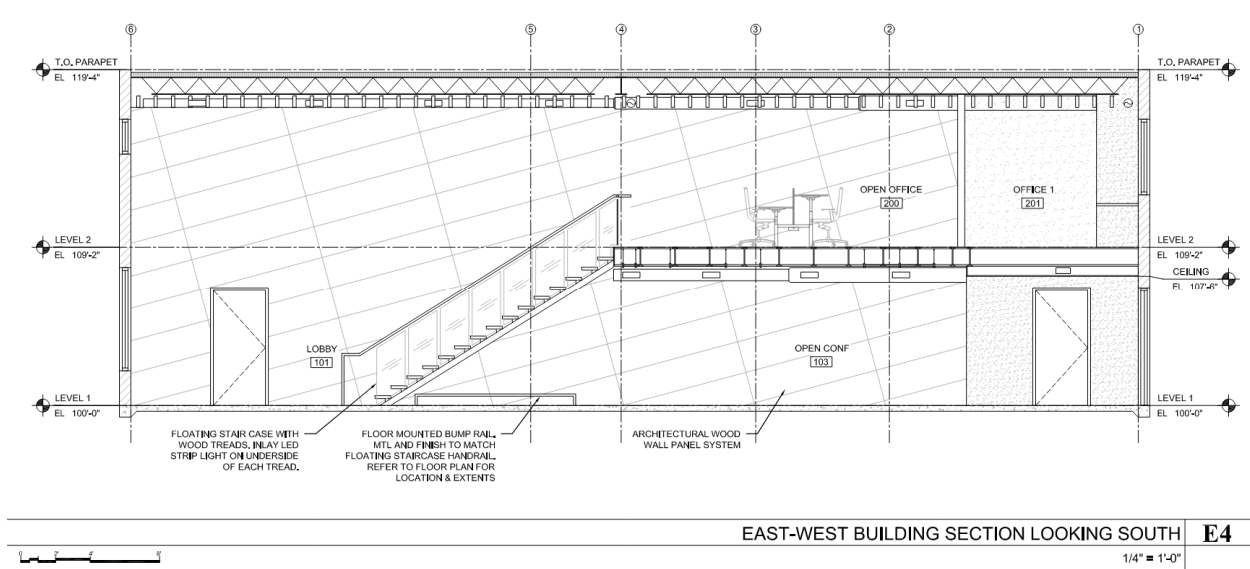
**Exhibit 2 – Proposed Elevator Lift/Locations**

	Impedes Lvl 1 Space Circulation	Impedes Lvl 2 Space Circulation	Requires Structural Modification
1	•	•	
2	•	•	
3			•

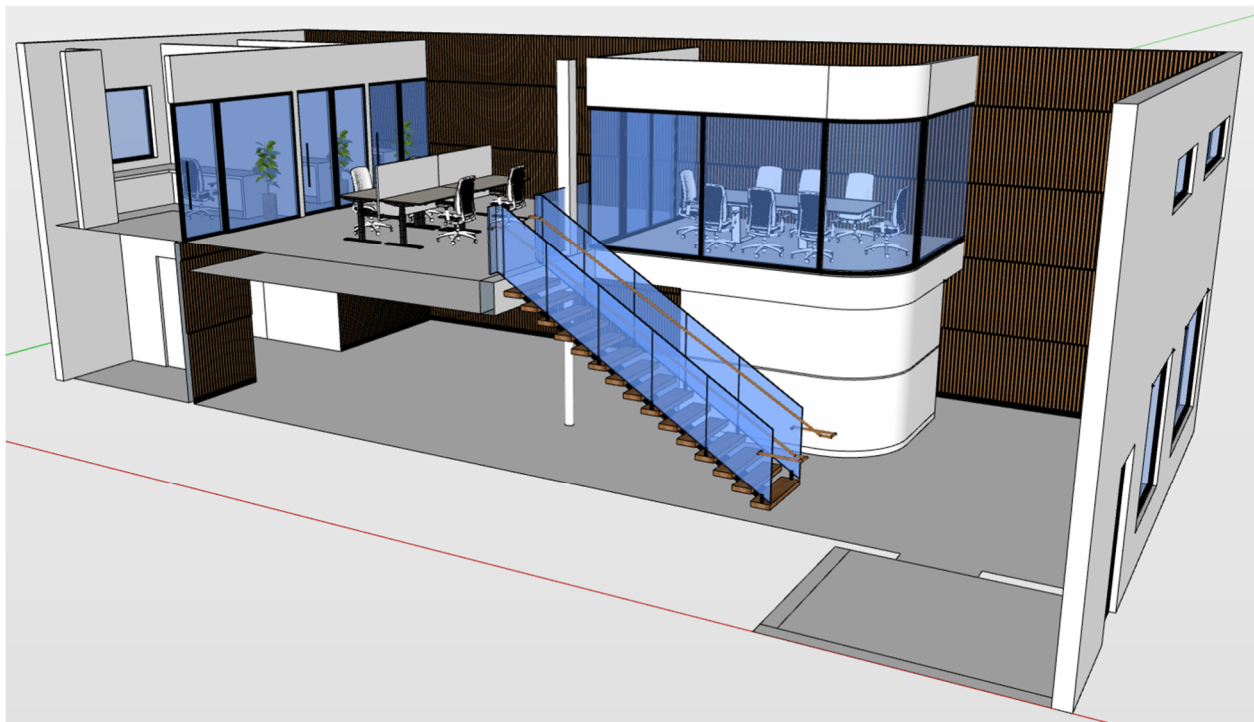


**Exhibit 3 – Proposed Ramp Location**

	Impedes Lvl 1 Space Circulation	Impedes Lvl 2 Space Circulation	Requires Structural Modification
1	●	●	●



**Exhibit 4 – Building Section**



**Exhibit 4 – Rendered Perspective**

Your Review and Consideration is appreciated,

