



September 12th, 2025

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

Re: 590 NW 27 St – Accessibility Waiver Application File No. 743-0

Dear Members of the Commission and Council:

The subject property is located at 590 NW 27 Street, Miami, Florida (the “Property”) and is improved with an existing warehouse building containing approximately 9,173 square feet of gross floor area. Based on the existing physical and structural conditions within the Property, it is technically infeasible to provide vertical accessibility mechanisms to serve the elevated bowling lane and the partial second-story. Please allow this letter to serve as the Licensed Design Professional’s comments for the accompanying ADA Waiver request.

The bowling area consists of a single elevated lane, accessed by three steps measuring approximately 6 $\frac{1}{3}$  inches each, with an additional set of three 6 $\frac{1}{3}$ -inch steps leading down to the adjoining kitchen area. The majority of the 731-square-foot room is occupied by this element. Installing ramps or a lift would require significant structural alterations and the loss of essential floor area, compromising the functional use of the space. Further, such an installation would likely interfere with the required residential bathroom.

Importantly, the remaining ground-floor area adjacent to the bowling lane and kitchen must remain clear for life-safety egress, leaving no feasible location to accommodate a vertical accessibility device. The kitchen is accessible from the south through the adjoining skateboarding area, allowing entry without passing through the bowling area. The bowling area of the building is intended solely for residential use and not for any business component. The entirety of the facility is intended for private use only and will not be open to the public. For these reasons, providing compliant vertical access to the bowling lane is technically infeasible, as it would require substantial structural alterations, reduce essential floor area, interfere with required facilities, and create direct conflicts with life-safety requirements.

Similarly, the partial second-story measures approximately 1,014 square feet out of a total gross floor area of 9,173 square feet, and is intended solely for the Owner’s private residential use. This represents a relatively small portion of the building. Installing vertical accessibility mechanisms to serve this area would again require substantial structural alterations, reduce essential floor area, and create conflicts with life-safety requirements, rendering such access technically infeasible.



Due to the building's age, warehouse configuration, structural limitations, and the need to preserve life-safety egress, it is technically infeasible to provide compliant vertical access to the elevated bowling lane and to the partial second-story. Strict compliance would compromise life safety and impede the functional use of the space, particularly where the areas at issue represent limited and private-use portions of the overall building.

Respectfully submitted for your consideration and approval.

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

Sincerely,

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R-S Architects  
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CC:

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