



ARCHITECTURE INTERIOR DESIGN PLANNING

November 5, 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: 2445 Collins Avenue – Accessibility Waiver Application File No. 752-0

Dear Members of the Commission and Council:

The subject property is located at 2445 Collins Avenue, Miami Beach, Florida (the "Property") and is improved with an existing hotel. Based on the existing physical and structural conditions within the Property, it is technically infeasible to provide elevators that fully comply with ADA turning space requirements. Further, provision of elevators that fully comply with ADA turning space requirements would threaten the historic integrity of this contributing structure. Please allow this letter to serve as the Licensed Design Professional's comments for the accompanying ADA Waiver request.

As originally designed and constructed in 1939, the layout of this Streamline Moderne-style historic building prohibits implementation of fully ADA-compliant elevators. It is technically infeasible to provide an elevator that complies with the ADA's requirements for turning space. Construction of an elevator fully compliant with ADA turning space requirements would require extensive modifications to the interior structure of the building which would compromise the historic integrity of the building. Due to the compact nature of the hotel building, there is no way to incorporate an elevator fully compliant with ADA turning space regulations without compromising the building's structural integrity and interfering with life-safety egress. Further, due to the constraints of the existing layout, any fully ADA-compliant elevator would obstruct the movement of guests on adjacent stairs and corridors.

The Applicant's architectural plans demonstrate extensive accessibility compliance in all other respects. The Applicant has ensured that the renovation of the building includes accessible pathways and ramps where required. Further, the new third elevator ensures compliance with life-safety requirements. Unlike the two existing historic elevators, the new third elevator is of sufficient width to accommodate a stretcher, ensuring life-safety on the premises. The Applicant's renovation plans for the building include a ninth-floor restaurant concept which will be fully ADA accessible. Provision of an elevator which fully complies with ADA turning space requirements would impede upon the building's other accessibility features and upon the movement of guests throughout the building.



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In addition to the technical infeasibility described above, provision of an elevator that complies with ADA turning space requirements would threaten the historic integrity of this contributing structure by

requiring fundamental changes to the building's structural framework, resulting in irreversible impacts to its defining historic features and public spaces.

The design elements in the building's ground floor lobby, as a public interior space, contribute considerably to the historic Streamline Moderne design. Any modification to the building's interior structure to accommodate an elevator that fully complies with ADA turning space requirements would irreparably harm the building's unique and identifying historic characteristics. As the owner of the building, the Applicant is responsible for maintaining these historic elements throughout the process of the proposed renovation, for the betterment of the property, the neighborhood, and the City of Miami Beach

Due to the building's structural layout, historic nature, and the need to preserve life-safety egress, it is technically infeasible to provide elevators that fully comply with ADA turning space requirements. Strict compliance would compromise life safety and the building's historic character and impede upon 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,



Kobi Karp

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