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October 26, 2026

Florida Building Commission
Accessibility Advisory Council
2601 Blair Stone Road
Tallahassee, Florida 32399-0772

Form FBC 2014-01, ADA Waiver #775-R0

Re: Professional Comment - Historic Building, Drew Residence
245 W 3rd Street, Jacksonville, FL 32206
Vertical Accessibility ADA Waiver to upper floors

To Whom It May Concern:

We are submitting a request for an ADA Waiver for Vertical Accessibility of an interior platform lift at this historic building. Constructed in 1909, the building is a contributing structure within the Springfield Historic District.

While we understand that accessibility improvements are required under the 2023 Florida Accessibility Building Code, installing an interior vertical platform lift or ramp would require substantial alterations to the historically significant interior spaces and distinguishing features. Compliance through this method will compromise the historic integrity of the building by altering or removing the original staircase, ceilings framing, flooring, and the decorative fireplace. Also, the required platform lift would disrupt the historic architectural character and spatial relationships of the interior.

As compliance through the installation of an interior lift would threaten or destroy the historic significance for this historic structure, we propose installing an exterior compliant platform lift at the rear of the building. This alternative approach will provide accessible access to the fully accessible first floor, where all primary public functions and accommodations will be located. It will also preserve the building's historic integrity, craftmanship, and character.

We respectfully request approval of an ADA Waiver and consideration of the proposed alternative approach method.

Thank you for your consideration.

Sincerely,

John Allmand, AIA
JAA Architecture, Inc.

